

RCRA Compliance Evaluation Inspection

Yuasa Battery, Inc.
2901 Montrose Ave.
Laureldale, PA 19605

RCRA Identification No. PAD095361655
Large Quantity Generator
SIC Code: 3691

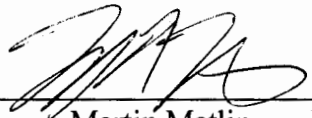
Dates of Inspection: September 15 & 22, 2009

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Martin Matlin
January, 2010

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1.0 Introduction

On September 15, 2009, the United States Environmental Protection Agency, Region III (EPA), Land and Chemicals Division, Office of Land Enforcement conducted an unannounced Compliance Evaluation Inspection (CEI) under the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. Sections 6901 et seq. of Yuasa Battery, Inc. ("Yuasa" or "the facility"). The EPA representative was Martin Matlin. The Pennsylvania Department of Environmental Protection was contacted prior to the inspection but was unable to send a representative. The facility was represented by Michael Raybuck, V.P. of Operations, assisted by Mark Richards, EHS Technician. On September 22, 2009, Mr. Matlin returned to the facility for a records review and to update/correct information collected during the first visit, as Robin Daub, Manager of Environmental, Health & Safety was out of the office on September 15. Ms. Daub, the facility's primary environmental representative, was contacted prior to September 22 to set up the return visit and was present on that day.

The inspector entered the facility at 10:20 a.m. on September 15, presented credentials to Mr. Richards, and proceeded to Mr. Raybuck's office to explain the purpose of the inspection.

The inspection included an evaluation of the facility's processes and its compliance with RCRA and the federally authorized Pennsylvania Hazardous Waste Code. All information included in this report is the result of statements by the facility representatives, materials shown to the inspector by the facility representatives and/or documents provided by the facility representatives to the inspector at the time of the inspection. In addition, information gathered prior to the inspection from a review of EPA and State records may be included in this report.

2.0 Facility Background Information

2.1 Description of Facility

Yuasa was established at this Laureldale location in 1979. It is part of the Yuasa Battery Inc. America division and a subsidiary of GS Yuasa in Japan, with no other manufacturing facilities in the US. It employs about 205 people working three shifts, five days a week. Yuasa manufactures "powersports" lead-acid batteries primarily used in motorcycles, snowmobiles, ATVs, etc.

2.2 Permit Status

Yuasa is currently reporting as a Large Quantity Generator and does not hold a RCRA permit. The facility maintains a Title V Natural Minor Air permit and discharges to the City of Reading through an approved Pretreatment permit. No USTs are present onsite according to the representative.

2.3 Process Description

Lead is brought onsite in the form of pigs, melted and cast into grids. These are pasted with "active material" (lead oxide, sulfuric acid and water, primarily) onto large plates of

absorbed glass mat material to form panels. The panels are then pre-charged and parted into individual plates. Pre-molded plastic cases and covers are combined with these components for final assembly. Some of the batteries are then "factory-activated" -- filled with acid and charged -- although most are shipped dry to a distribution center.

3.0 Hazardous and Non-Hazardous Waste Generation

The following primary waste streams are classified as hazardous or non-hazardous according to the facility's generator knowledge:

- **Grid Casting:** typically recovered and reused onsite
- **Grid Paste:** some ends up as waste, but the initial representative was unsure whether it was considered Hazardous Waste (HW) by the facility
- **Scrap panels and grids:** stored in drums, sent offsite as HW
- **Batteries:** if scrap, disposed as HW; if spent, either recharged onsite or sent offsite for recycling
- **Spent flux material:** stored in drums, sent offsite as HW
- **Used PPE:** collected in hoppers throughout facility, then dumped into outdoor roll-off container, disposed of as HW
- **WWTP sludge:** F006 sludge is generated in the onsite wastewater treatment plant, collected in carts, then dumped into a roll-off and sent offsite as HW
- **Aerosol cans:** punctured onsite and sent offsite for disposal, with the contents disposed of as HW
- **Used oil:** generated primarily from equipment lubrication, stored in "Oil Shed" -- Mr. Richards believed it is typically sent offsite as HW
- **Used lamps:** stored in HW room and sent offsite as Universal Waste

4.0 Hazardous Waste Storage

The facility maintains one less-than-90-day storage area and about eight satellite areas throughout the plant, according to the initial representative.

5.0 Inspection Observations

A tour of the facility began at 11:00 a.m. on September 15 and resulted in the following observations:

5.1 Roll-Off Storage Area

The facility maintains a HW storage area in a back parking lot where a 30yd³ roll-off container was being stored (see Attachment 1, Photographic Log, Photograph 1). The container was labeled as "Residual Waste" with no HW label or date. The tarp cover for the roll-off was mostly open, and inside the container were several unlabeled plastic bags, some of which were torn (Photos 2 & 3). A hopper containing used PPE was emptied into the roll-off container during the inspection (Photo 4).

On the inspector's return visit on September 22 a HW sticker had been applied to the roll-off container, although a "Residual waste" sticker was still present on the side (Photo 54). The tarp remained open, and although the individual bags inside the roll-off appeared closed, none were labeled or dated (Photos 55 - 57). Ms. Daub stated that the tarp was open because the operator was currently putting hopper loads in, although he was not seen to do this during the inspection that day.

5.2 Wastewater Treatment Plant

An open 55gal drum was found near the output chute for filter press "FP-302" containing what was described as "lead mud" and labeled as "UN3077 RQ, Environmentally Hazardous Substances, Solid, N.O.S, 9, III (Lead)" (Photos 5-8). On the inspector's subsequent visit Ms. Daub stated that the contents would be sent offsite for reclamation at a lead smelter.

A second filter press ("FP-312") was found nearby with an open, unlabeled cart beneath it containing sludge and used gloves (Photos 9 & 10). The representative stated that this was generated from the microfilter process tank. He further stated that one of these carts would typically be filled per day that the process is running, and that after three or four days the bag liners in each filled cart are zip-tied and the contents dumped into the HW roll-off container outside.

5.3 Baghouses

Four baghouses are maintained outside the main building: at the northernmost end is baghouse #3, which collects dust from the Grid Casting area (Photos 12 & 13), then baghouse #4 (Photos 11 & 14), baghouse #2 (Photos 15 & 16) and baghouse #1 (not photographed). Each of the baghouses discharge into a 55gal drum with the above-described UN3077 label.

5.4 Grid Casting Area

An open, undated hopper was found in the Grid Casting Area, labeled as HW and full of what appeared to be spent PPE and towels inside a plastic liner (Photos 17 & 18). The representative stated that when full the bag would normally be removed and placed into the HW roll-off container outside. Several of these hoppers were found throughout the facility, as described below, and were labeled as being one cubic yard/2,000 pound capacity.

Four open buckets of dross were also found in this area (Photo 19). Mr. Richards stated

that typically this would be re-melted, but occasionally has gone out as HW. He was unsure what determined whether the waste would be HW or reusable and stated that the operator makes that decision.

5.5 Grid Storage Area/Hazardous Waste Room

Twelve 55gal drums of HW were found against the wall of this room, nine of which were black and labeled as containing flammable solids, toluene and xylene (Photos 21 & 22). The three remaining drums were blue and labeled as containing D008 material (Photos 21, 23 & 24). All of the black drums and one of the blue drums were undated.

At the end of this aisle, nine open buckets of dross were also found (Photo 25). The buckets were labeled as containing inorganic lead (Photo 26) but not otherwise labeled or dated. On September 15 the inspector was told these buckets would be disposed of as HW, but Ms. Daub later specified that they were not considered HW and would be sent off for recycling.

Also in this room is the facility's aerosol can puncturing device, situated on top of a 55gal drum used to contain the drainage, next to a storage container full of punctured cans (Photos 27 & 28). At the time of the inspection on September 15 the puncturing device (which opens into the drainage drum) was open (Photo 29) and labeled only as "Spray paint cans only." It felt fairly full of material. On the inspector's return visit on September 22 the puncturing device was closed, the attached drainage drum felt fairly empty, but the label on the drum had not changed (Photos 50 - 52).

On the opposite side of the room from the twelve drums described above, an additional thirty-one 55gal drums were present, each labeled with the UN3077 sticker (Photos 30 & 31). Again, the initial representative stated these would be disposed of as HW, but Ms. Daub later stated they were intended for offsite reclamation.

5.6 Main Production Area

Two hoppers were found in the Pasting Department area, both labeled as containing HW D008 and undated (Photos 32 & 33). One of these hoppers was over half full of used PPE (Photo 34), whereas the second one was almost empty (Photo 35).

An additional hopper was found in the Formation area, labeled as HW and dated 10/13/08 (Photos 36 & 37). It appeared to be full of various lead-contaminated materials (Photo 38).

Another hopper was found in the Maintenance/Case Formation/Distribution Center area (referred to by the representatives as the "community" hopper), labeled as containing HW, full, and undated (Photos 39 - 41). The HW label referred to the contents as being "RQ, UN3077, Hazardous waste, solid, N.O.S., 9, PG III (Lead)" -- similar to what is listed on the facility's stickers for material going out for reclamation, but including the phrase "Hazardous waste."

In the Plate Parting area, four 55gal drums were found (Photo 42). The black drum photographed on the far left was open and about 1/3 full of various solids (Photo 43). The blue

drum seen on the far right was also open and about ¼ full of a granular material (Photo 44). The inside black drum was closed and felt fairly full. The inside blue drum was empty. All of the drums had the UN3077 sticker as their only label, and were planned to be eventually disposed of as HW according to the initial representative.

In the Assembly area another hopper was found labeled as HW, undated, and full of what was described as “separator material” by the representatives (Photos 45 - 47).

5.7 QC Lab

Two plastic containers were found here in an area intended as satellite collection (Photo 48). The blue container shown on the left was labeled as “Hazardous waste satellite storage barrel” whereas the yellow container was unlabeled. It contained a smaller plastic container inside it which itself held a small amount of solids (Photo 49), and was described by Mr. Richards as intended to go out for recycling at the smelter.

5.8 September 22 Return Visit

As the two initial representatives stated they had no access to any requested records on September 15, Mr. Matlin returned on September 22 to conduct the records review. The inspector arrived at 10:07 a.m. and presented credentials to Ms. Daub. A brief second tour began at 10:20, when the inspector was taken back to the Grid Storage Area/HW Room. Except for the can-puncturing drum and storage container, all of the drums seen on September 15 had been removed (see Attachment 2 for copies of manifests related to these shipments). Ms. Daub stated that the twelve HW drums had primarily contained rags used for cleaning during a recent shutdown, and that typically only about one or two drums of HW rags are generated per month. She also stated that any drum or bucket with the UN3077 sticker is not considered HW, but instead is sold for credit to a smelter for lead recovery. This would apply to the baghouse drums as well. The outdoor roll-off container was also revisited as described in Section 5.1 above, and then the records review began.

6.0 Records Review

6.1 Manifests and LDR Forms

Manifests and Land Disposal Restriction (LDR) forms for the years 2007-2009 were reviewed and the following concerns were noted: TSD-signed copies were not found for the following manifests: #2054654 for a shipment dated 4/5/07; #2054896 and #2054897 for two shipments on 5/22/07 (see Attachment 3 for copies of these manifests).

6.2 Inspection Records

The facility records weekly inspections of twelve different areas within the plant, reviewing container locations, conditions, labeling, sealing, general areas and signage. No concerns were found for any of the 2009 inspections. In 2008 no inspection reports were found between the following dates: 4/11 and 4/25, 6/6 and 6/20, 6/27 and 7/11, 8/28 and 9/11, 9/25 and

10/9, 10/23 and 11/13, 11/20 and 12/4, and 12/18 and 1/8/09. In 2007 nothing was found between the dates of 1/5 and 9/7. In 2006 records were not found for any inspections in January nor between the dates of 6/29 and 7/13, 11/17 and 12/1, and 12/1 and 1/5/07. In 2005 only one report was found, dated 1/7. Ms. Daub stated that Dan Miller has typically conducted these inspections since the facility was last issued an NOV by PADEP, and that some of the missing dates relate to shutdowns at the plant. See Attachment 4 for a sample inspection record (all inspection records present were copied and retained by the inspector).

6.3 Contingency Plan

Yuasa maintains a "Spill Prevention/Control Plan" which states on the outer cover that it was last revised on January 2007, although an inside page states it was revised 1/25/09. It contained very minimal responses to possible fires and explosions, with more detailed information included relating to possible releases. It listed two people (Ms. Daub and Mr. Raybuck) as emergency coordinators and contained their home and cell phone numbers, but no addresses. It did not include a list of emergency equipment.

6.4 Biennial Reports

Biennial Reports for the years 2003 through 2007 were reviewed and no concerns were noted. For each year the facility reported as a Large Quantity Generator.

6.5 Training

The facility does not appear to maintain a specific list of employees required to receive HW training, although yearly "HAZWOPER Awareness" training (conducted by Ms. Daub) is required for every employee working in the production area. No job descriptions were found at the time of the inspection, although Ms. Daub stated that they are retained on a separate computer database which she could print and fax the following day. Ms. Daub stated that the following personnel are considered HW handlers: Larry Allen, Emily Surman (who left the facility on 8/28/09), Mark Richards and Ed Shaub (who was recently added).

Besides the yearly awareness training, some employees also receive offsite training conducted by Elk Environmental, including a session on 8/14/09 for Mr. Allen, Mr. Shaub and Ms. Surman, and sessions on 9/15/08 and 8/17/07 for Mr. Richards and Mr. Allen. No training records were found for Ms. Daub for 2007 or 2009, or for Mr. Raybuck or Mr. Miller for any years. See Attachment 5 for copies of Ms. Daub's offsite training certificates.

6.6 Waste Profiles

The facility maintains profiles for several waste streams, including analyses showing hazardous lead levels for "gutter mud" (7/27/09 sample), "WWT lead mud" (1/17/08 sample), "DTC filter press" and "Pb mud filter press" (5/30/08 samples -- see Attachment 6), and "baghouse dust" (3/21/06 sample). "Lead Calculation Sheets" are maintained to track lead levels in all materials going to the smelter for recovery, including tank cleanouts, lead "mud" filter press sludge, and acid-resistant bricks used in the Formation area. See Attachment 7 for a copy

of a sample Lead Calculation sheet and bills of lading used to transfer lead waste offsite.

7.0 Post-Inspection Communication

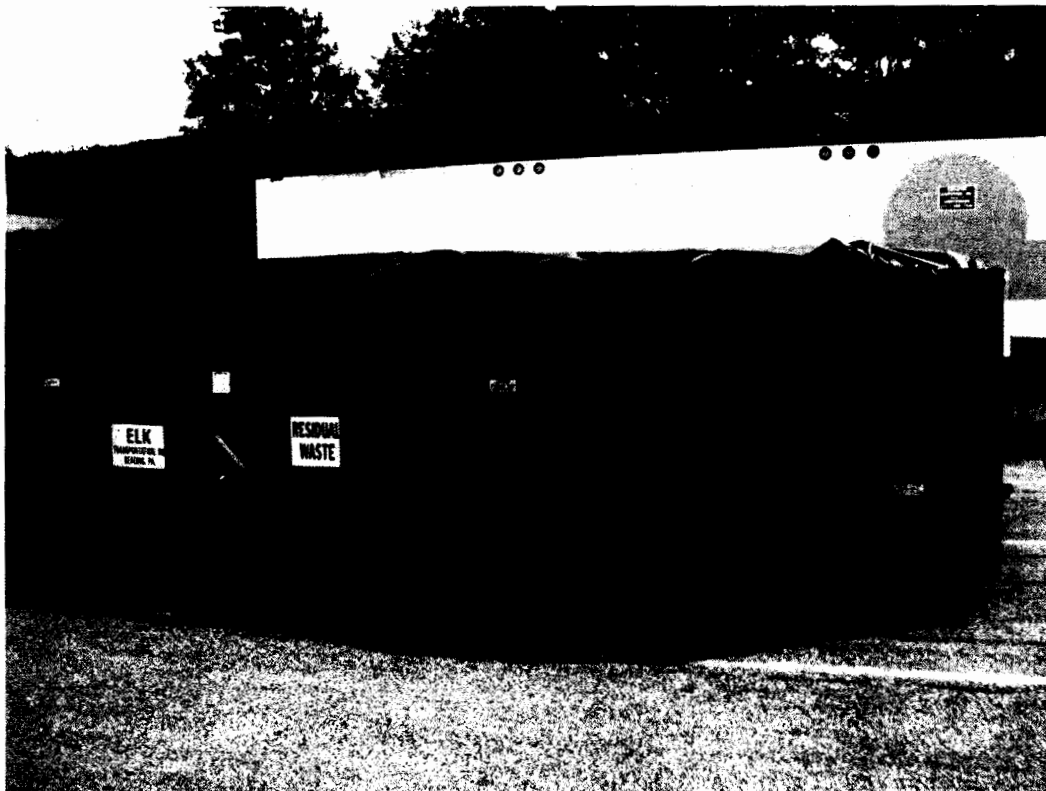
Ms. Daub emailed the inspector on 9/25/09 and 10/27/09 to provide updated information and documents (see Attachment 8 for the text of the emails), including an electronic copy of the Spill Prevention/Control Plan similar to that in effect at the time of the inspection as well as a newly-revised version, copies of "Hazmat Ops" and "trauma skills review" training certificates for Mr. Miller, and a site plan.

8.0 Attachments

1. Photographic log
2. Manifests ## 6070089, 6070088, 6070092 relating to HW shipped 9/16/09
3. Manifests ## 2054654, 2054896, 2054897
4. Inspection record for 1/7/05
5. Robin Daub's offsite training certificates
6. "DTC filter press" and "Pb mud filter press" sample analyses
7. Sample Lead Calculation sheet and bills of lading
8. Copies of 9/25/09 and 10/27/09 emails from Ms. Daub to Mr. Matlin

Attachment #1

Photographic Log
Yuasa Battery, Inc. PAD095361655
Inspection Date 9/15/09



Photograph 1: 30yd² Hazardous Waste roll-off container labeled only as "Residual Waste" with cover open



Photo 2: View inside Photo 1 roll-off from above

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Photo 3: Close-up of torn bag inside Photo 1 roll-off



Photo 4: Operator emptying HW hopper into Photo 1 roll-off during inspection (hopper contained PPE primarily)

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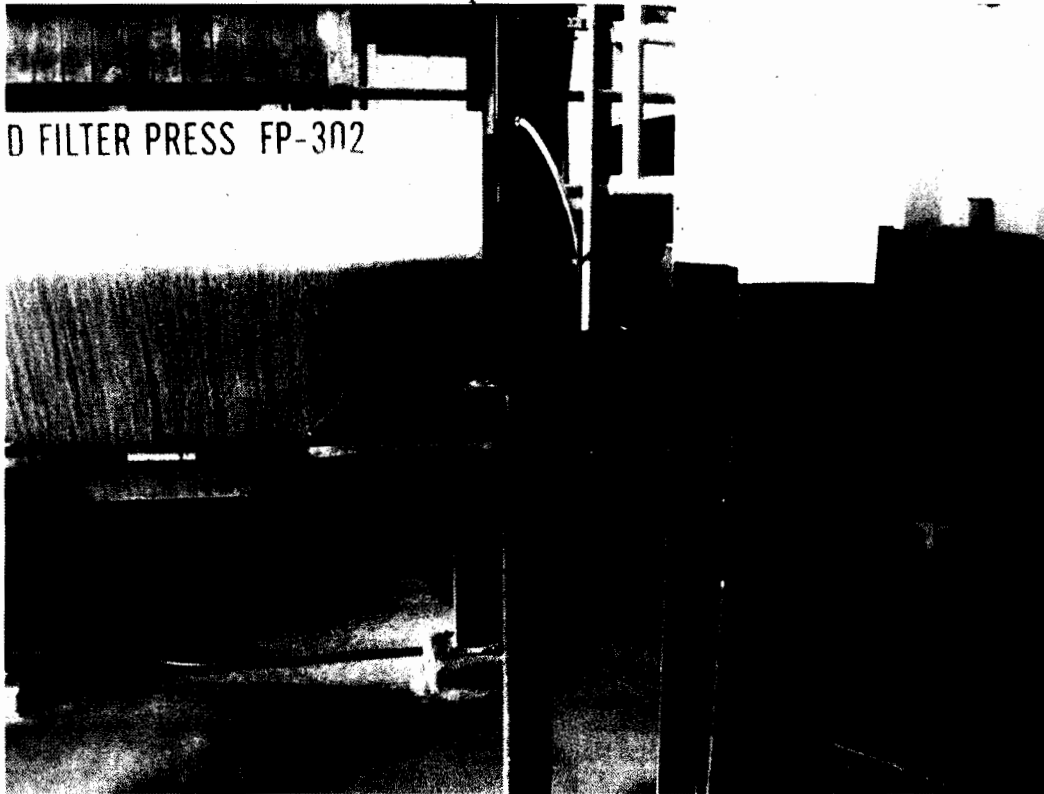


Photo 5: Output of filter press, with open drum in background containing material from press



Photo 6: 55gal drum from Photo 5

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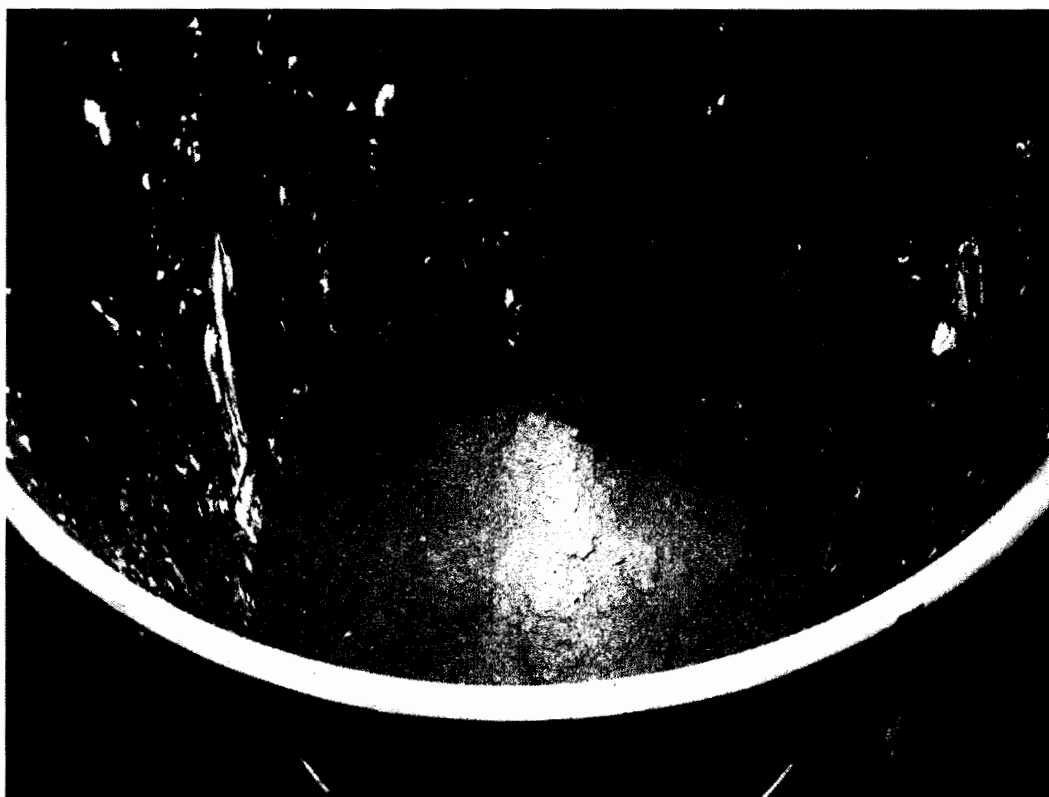


Photo 7: View inside Photo 6 drum

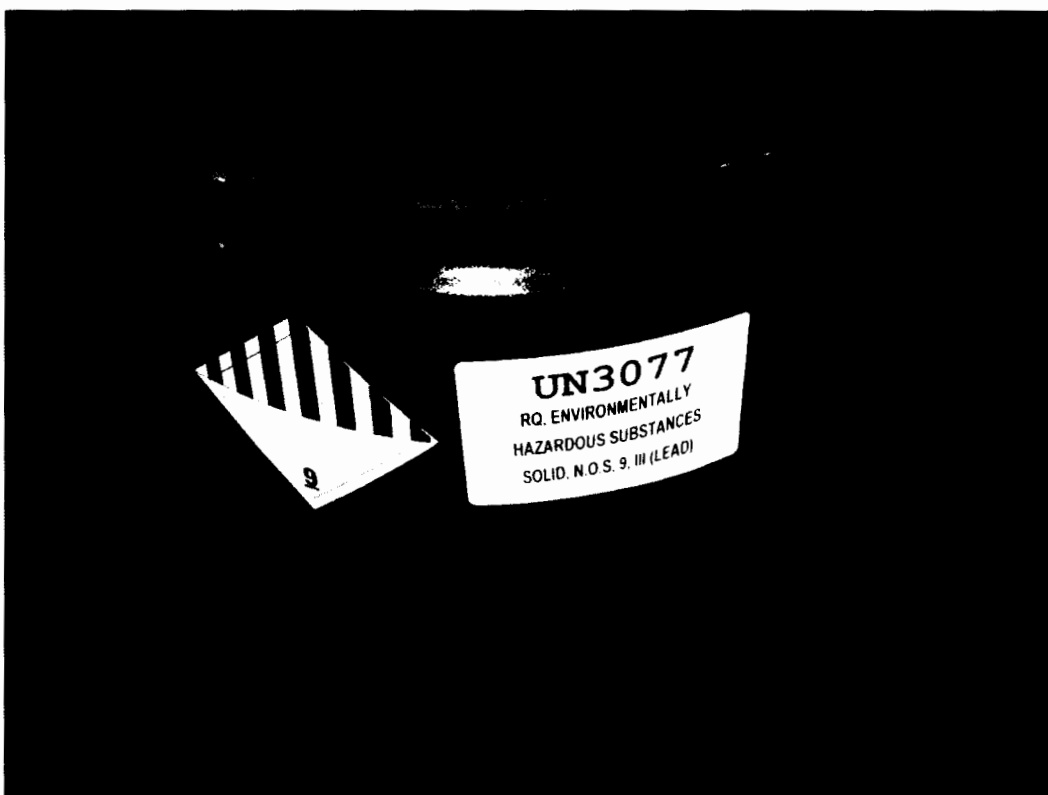


Photo 8: Label on Photo 6 drum

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Photo 9: DTC filter press with open cart full of HW sludge underneath



Photo 10: Close-up of cart containing HW sludge -- not labeled as HW

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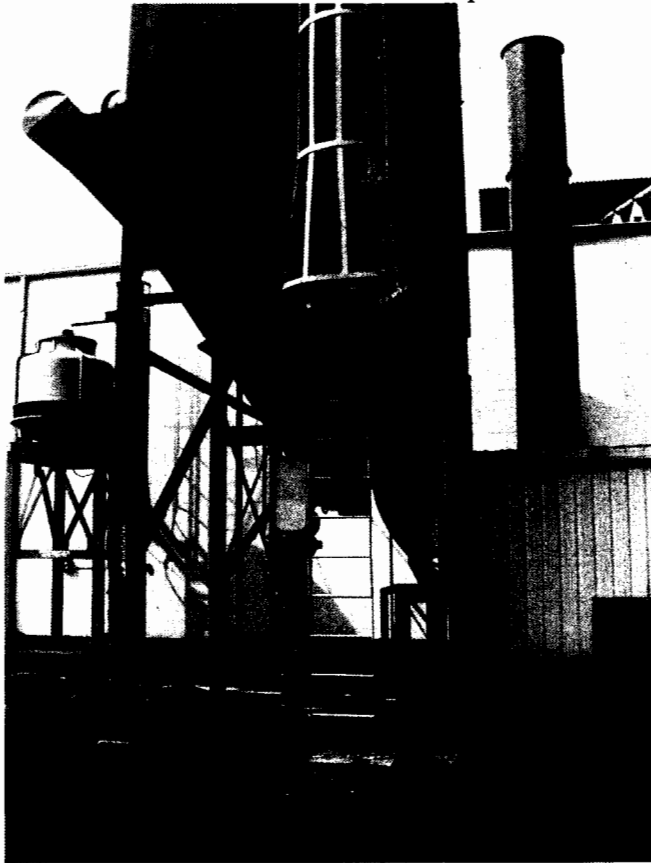


Photo 11: Dust collection point for Baghouse #4

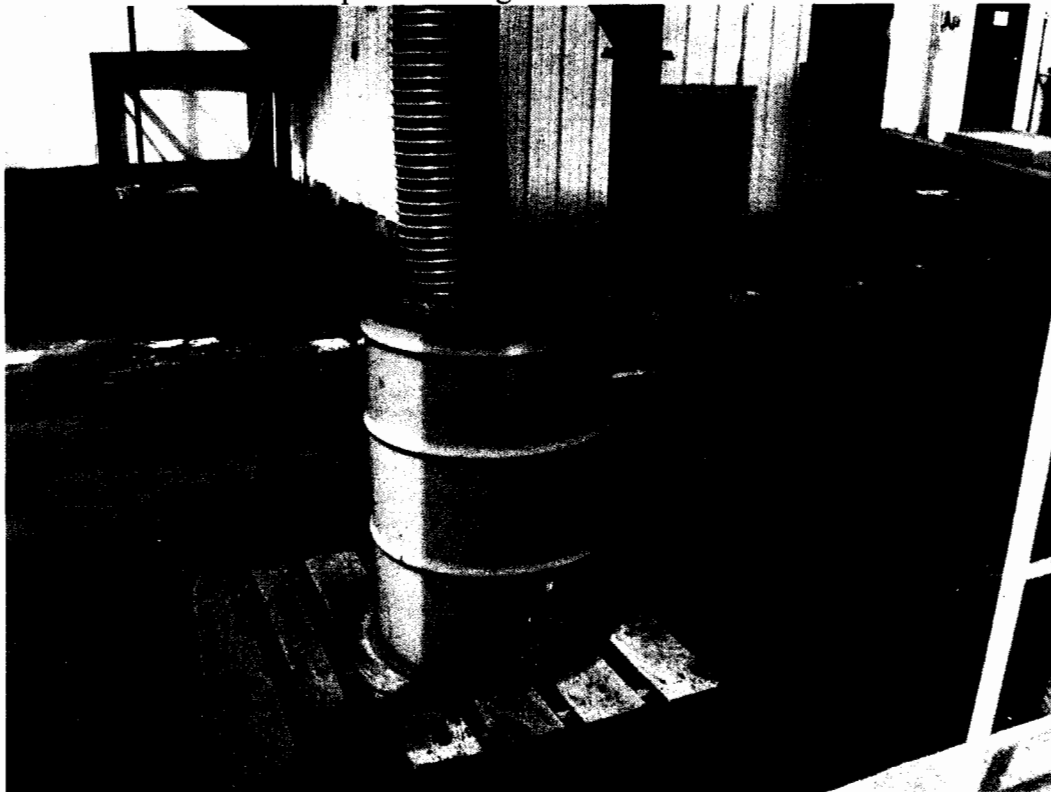


Photo 12: Close-up of drum from Photo 11

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Photo 13: Dust collection point for Baghouse #3



Photo 14: Label on drum from Photo 13

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Photo 15: Dust collection point for Baghouse #2

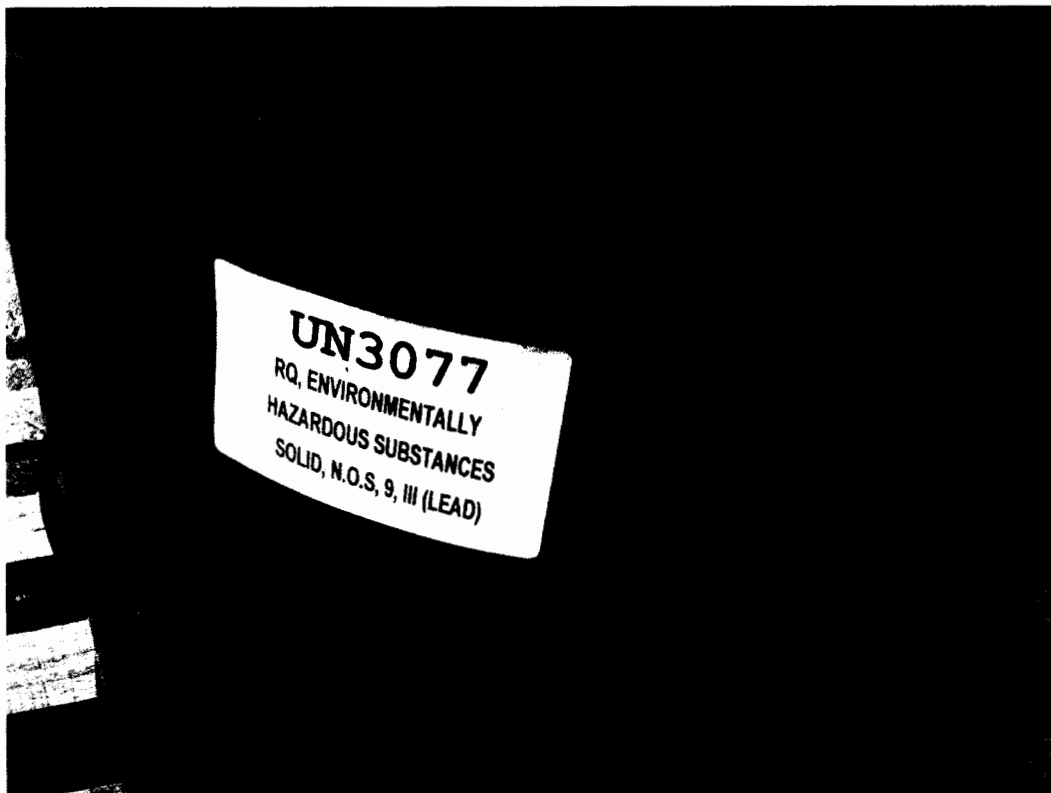


Photo 16: Close-up of label on Photo 15 drum

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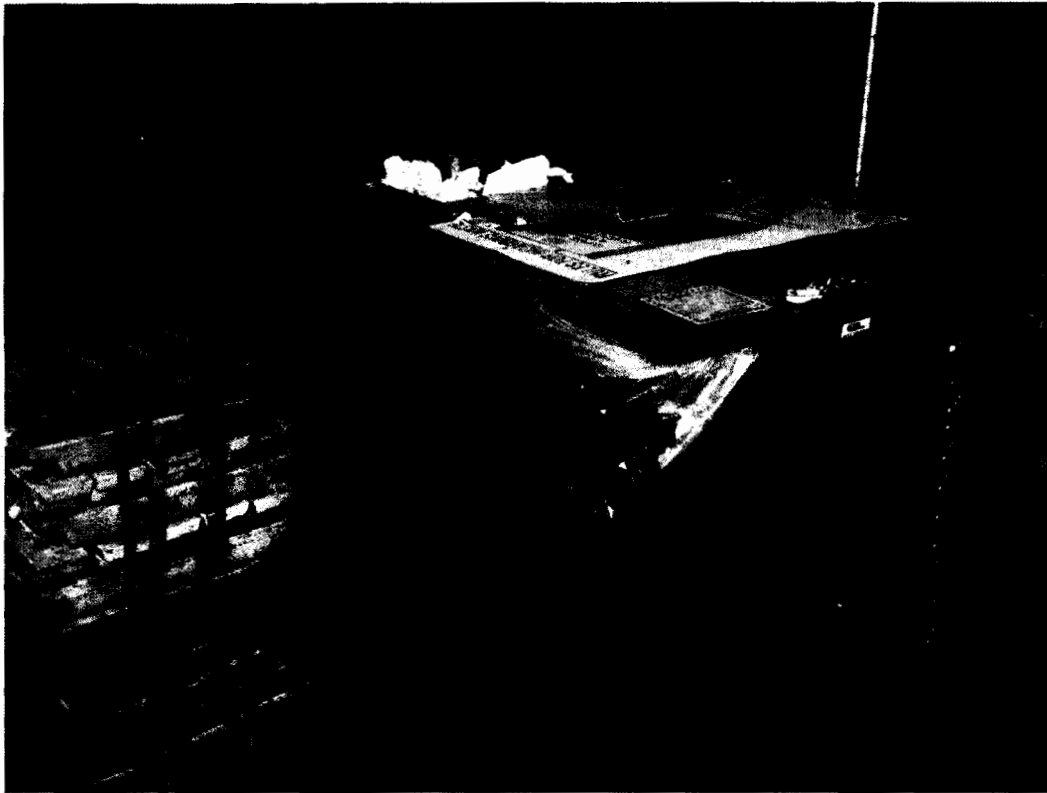


Photo 17: Hopper in Grid Casting area -- open, labeled as HW, not dated



Photo 18: Labels seen on top of Photo 17 hopper

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Photo 19: Four open buckets containing dross in Grid Casting area



Photo 20: Open HW hopper in Grid Storage/HW Room

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Photo 21: Twelve 55gal drums of HW in Grid Storage/HW Room (front 10 undated)

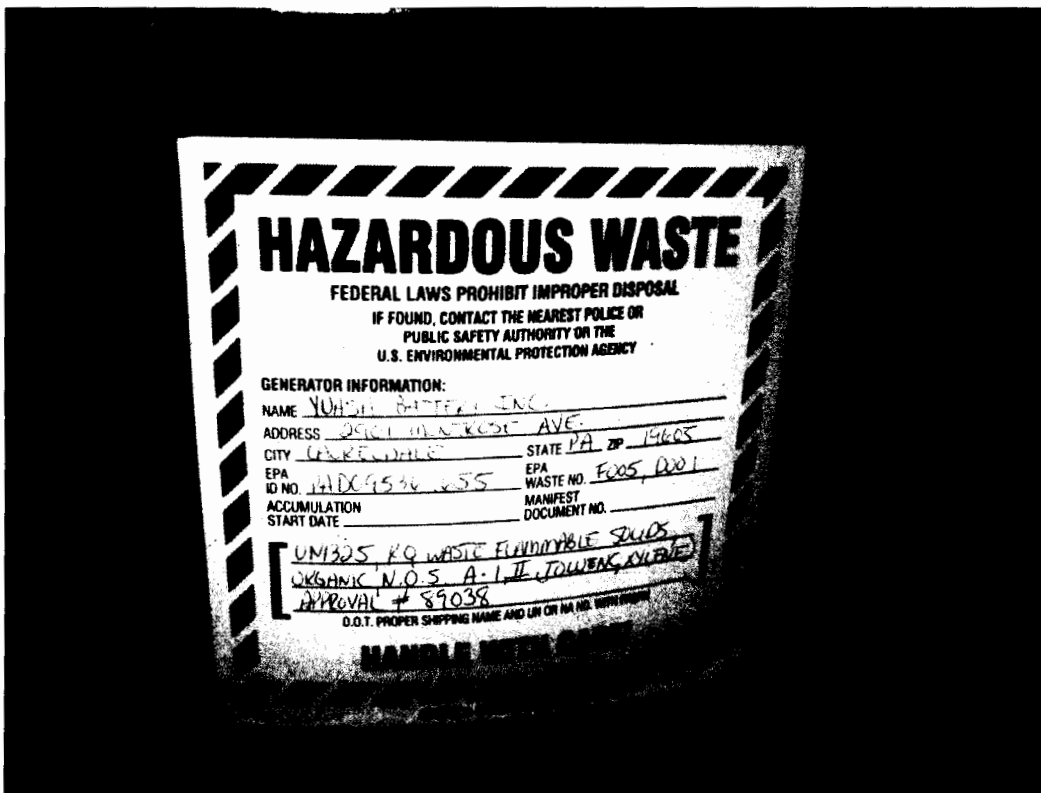


Photo 22: Close-up of label on leftmost drum from Photo 21 -- no date

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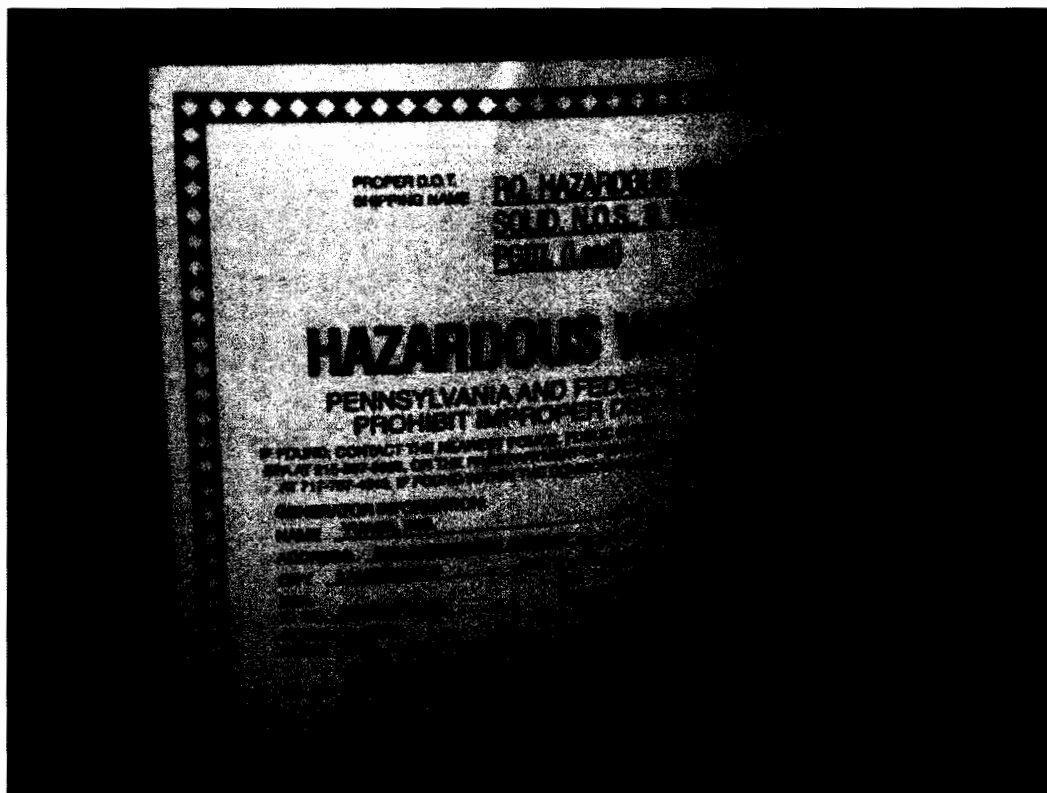


Photo 23: Close-up of label on leftmost blue drum from Photo 21 -- no date

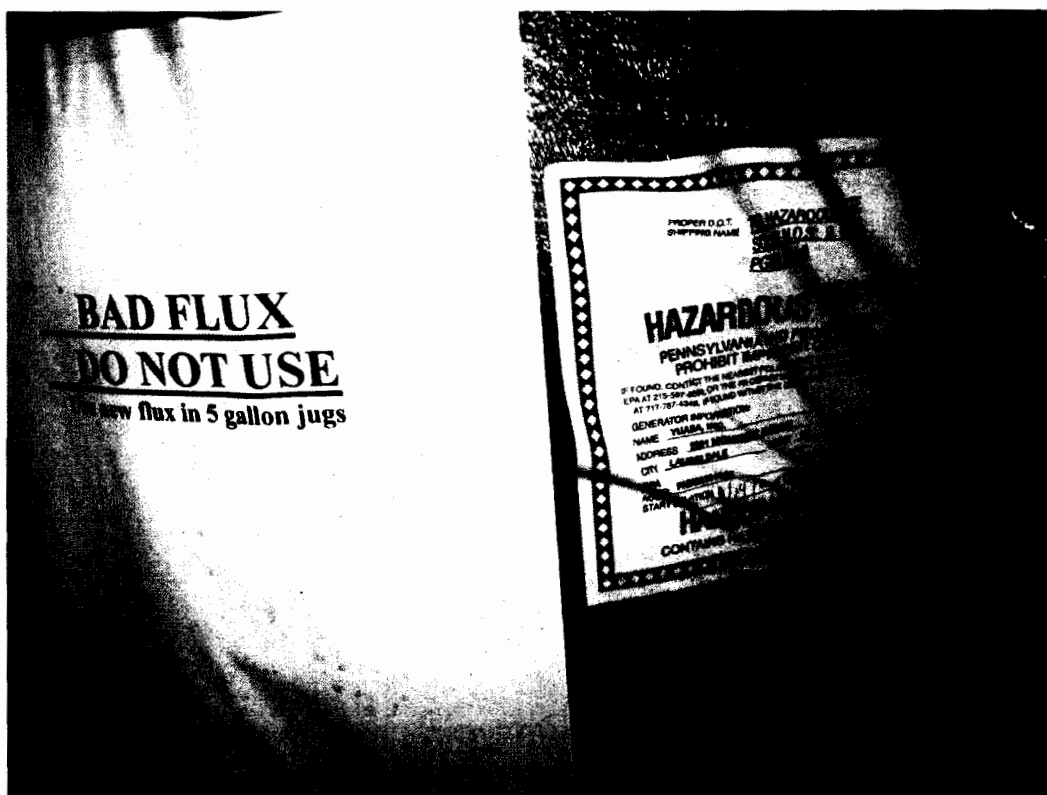


Photo 24: Close-up of label from one of two rightmost drums in Photo 21, both dated

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Photo 25: Nine open buckets of dross in Grid Storage/HW Room

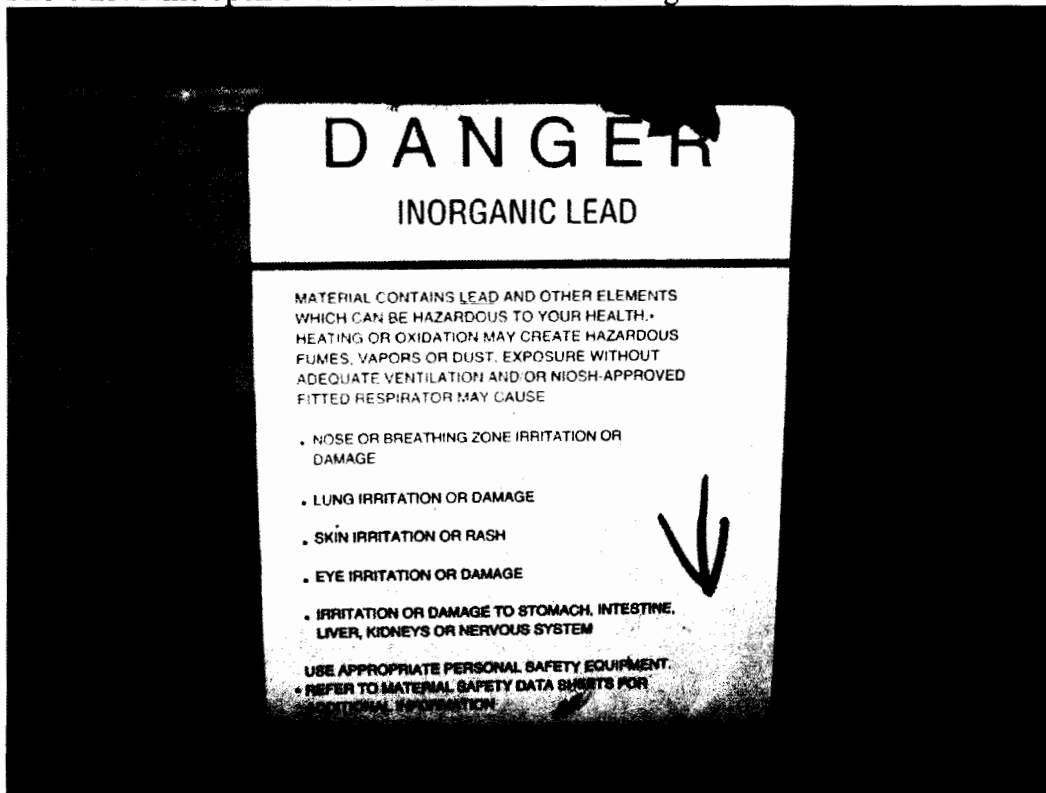


Photo 26: Close-up of label on dross buckets from Photo 25

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Photo 27: Can puncturer and storage drum (front) and can container (rear) in Grid Storage/HW Room



Photo 28: View inside can container from Photo 27

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Photo 29: View from top of can puncturer in Photo 27 -- open

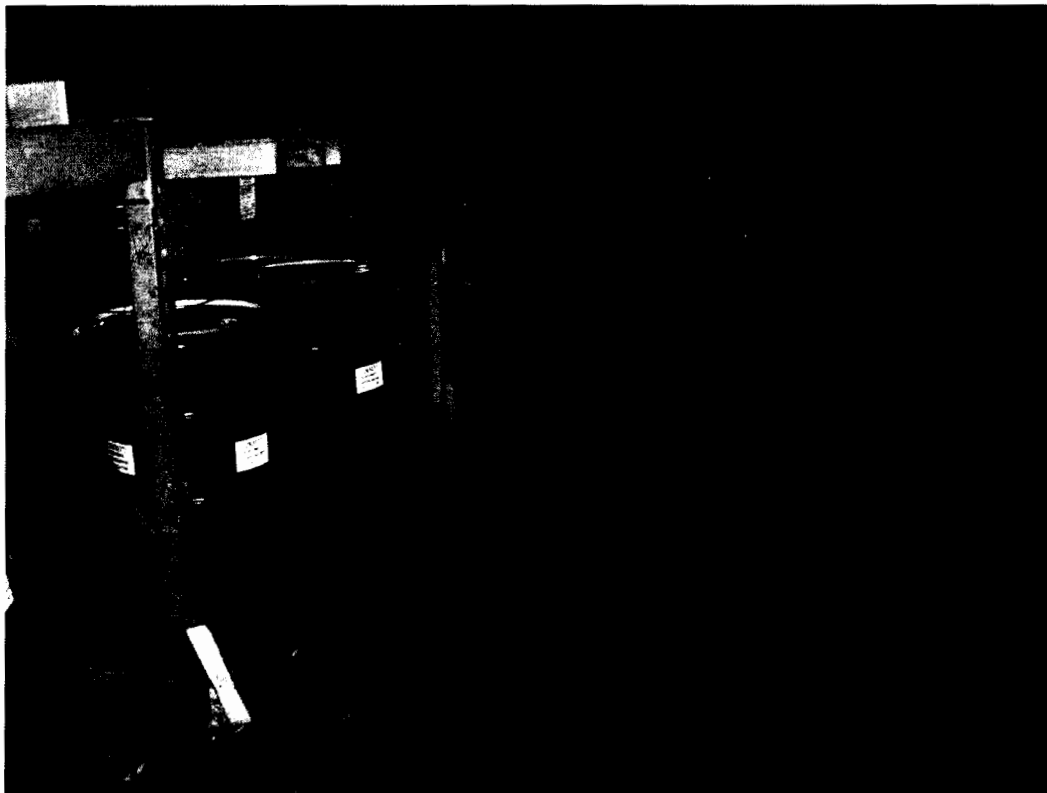


Photo 30: Lead-containing drums in Grid Storage/HW Room

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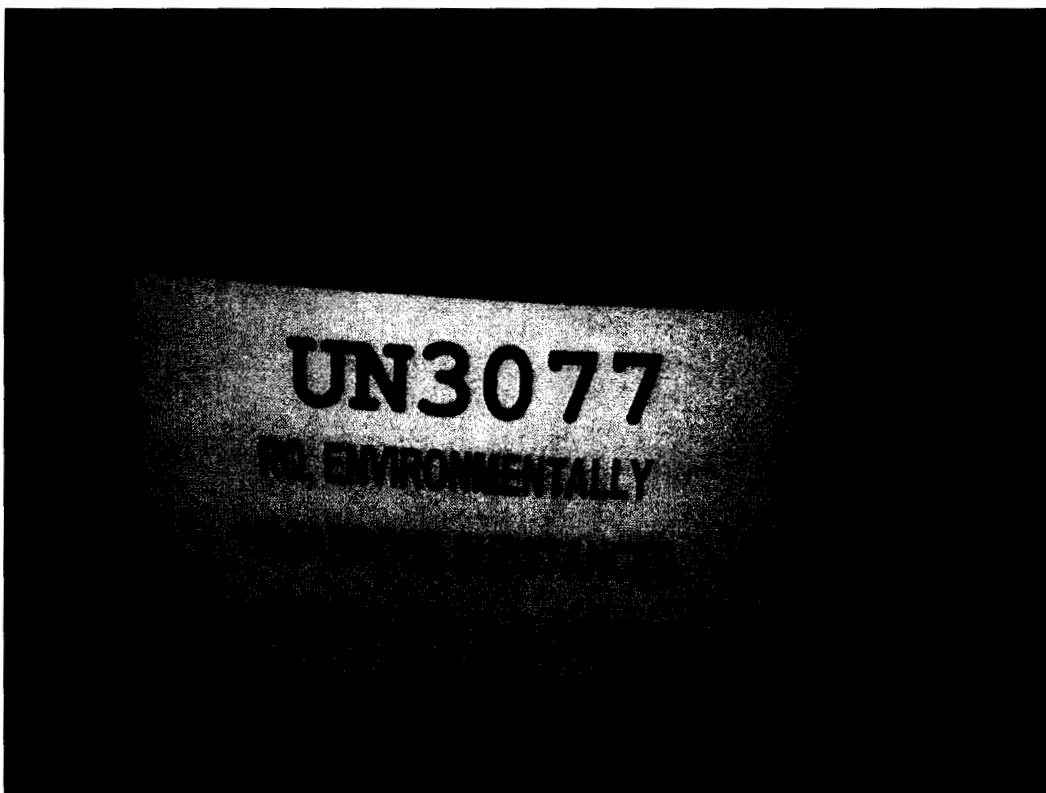


Photo 31: Label on lead-containing drums from Photo 30

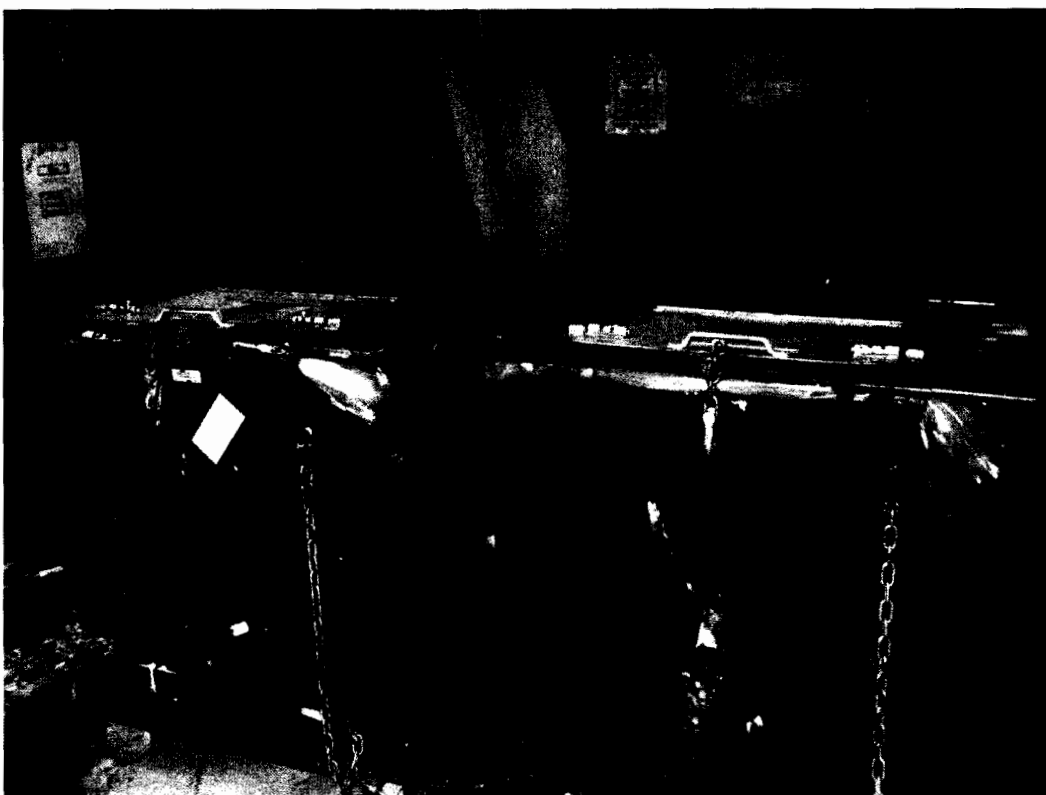


Photo 32: Two HW hoppers in Pasting Dept, labeled as HW D008

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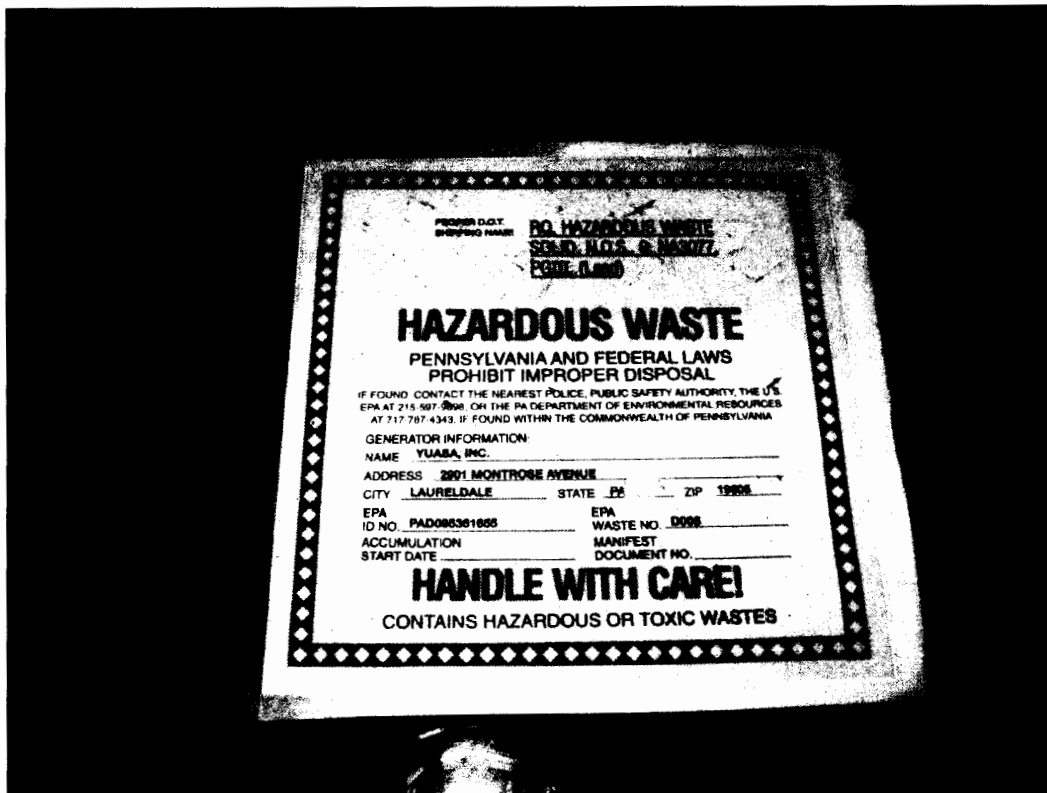


Photo 33: Close-up of label from Photo 32 hopper on right -- no date



Photo 34: View inside Photo 32 hopper on right

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Photo 35: View inside Photo 32 hopper on left

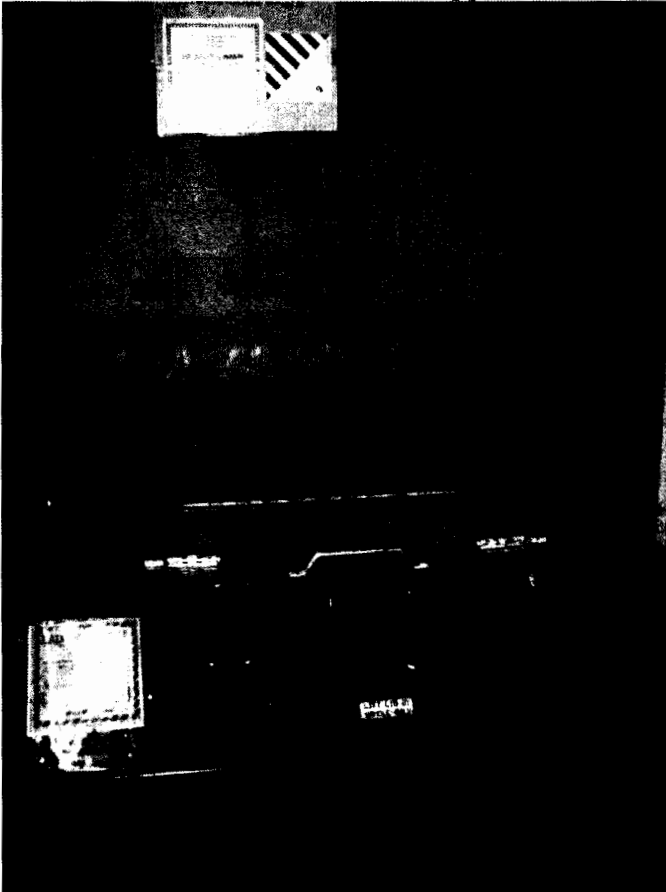


Photo 36: HW hopper in Formation area, labeled HW and dated 10/13/08

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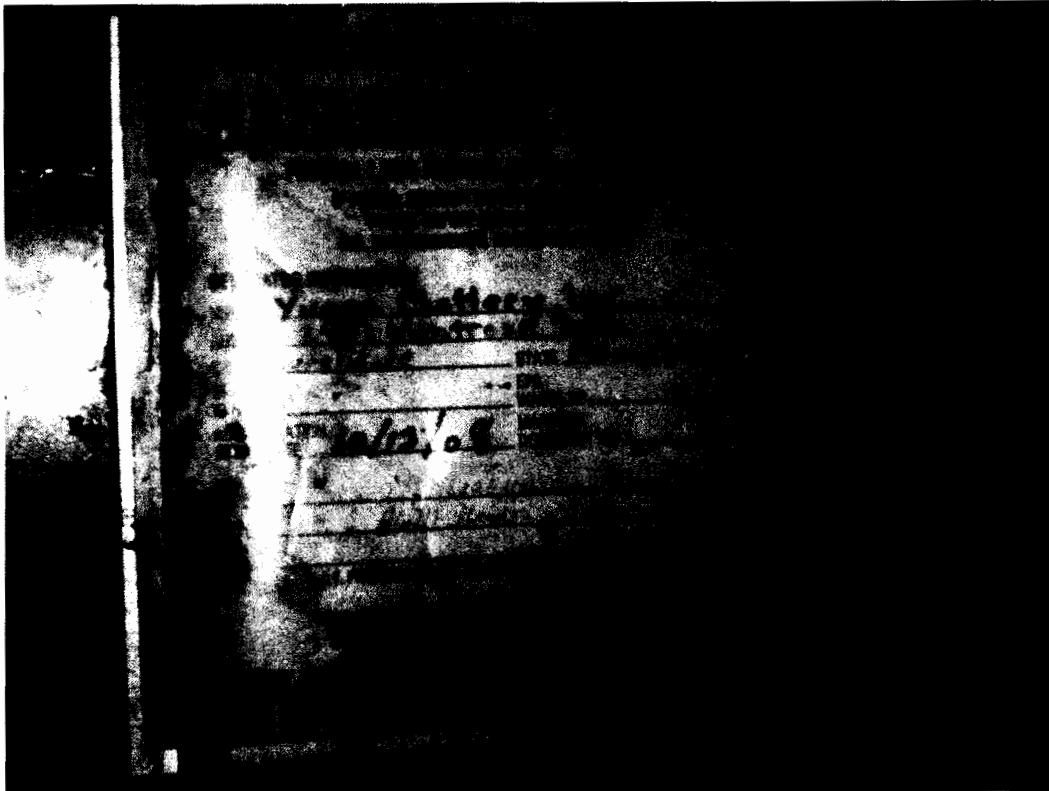


Photo 37: Close-up of label on Photo 36 hopper



Photo 38: View inside Photo 36 hopper

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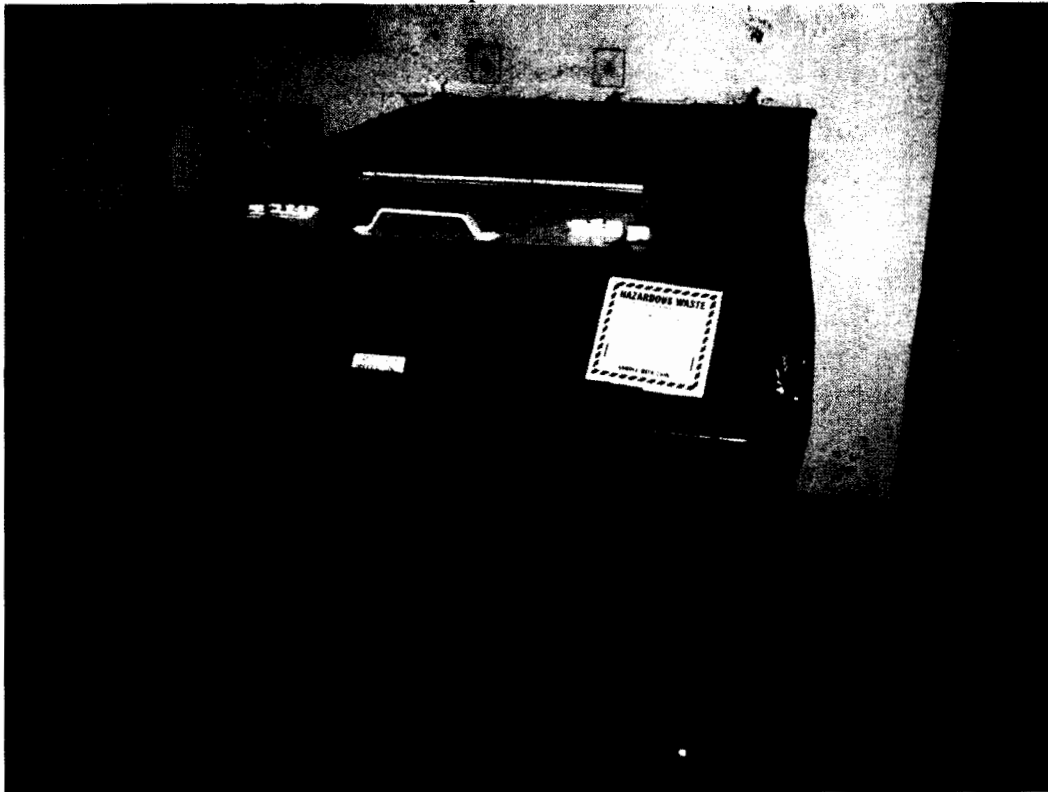


Photo 39: HW hopper in Maintenance/Case Formation/Distrib. Center

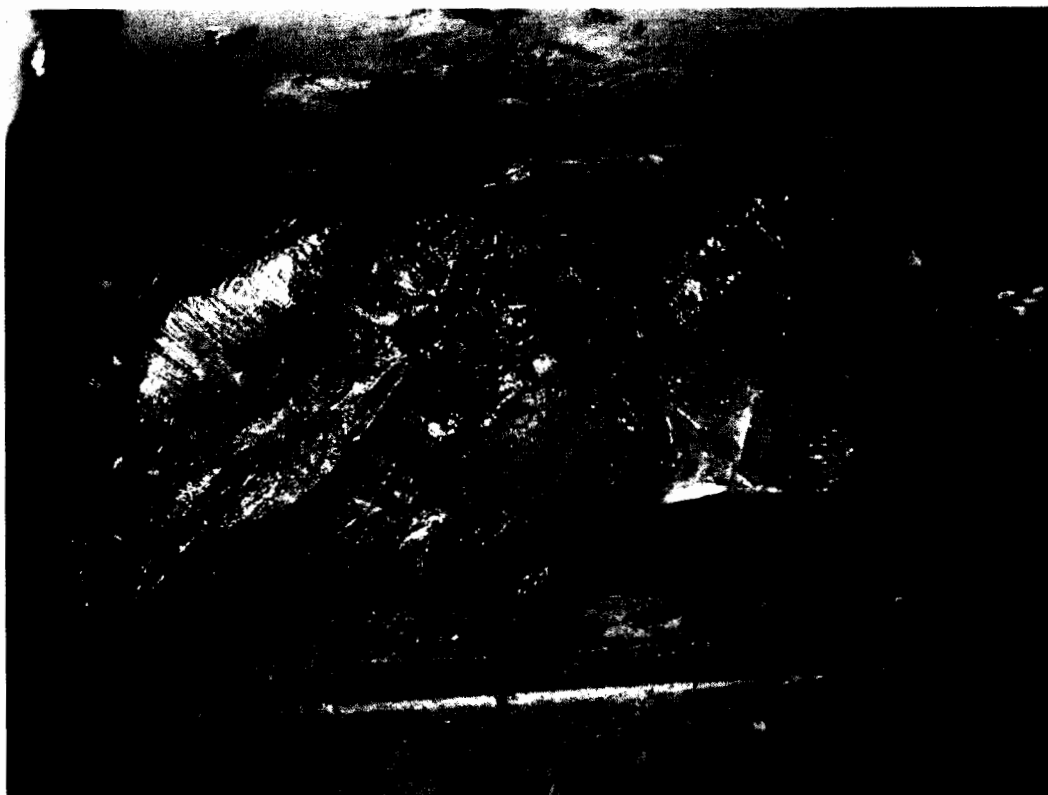


Photo 40: View inside Photo 39 hopper

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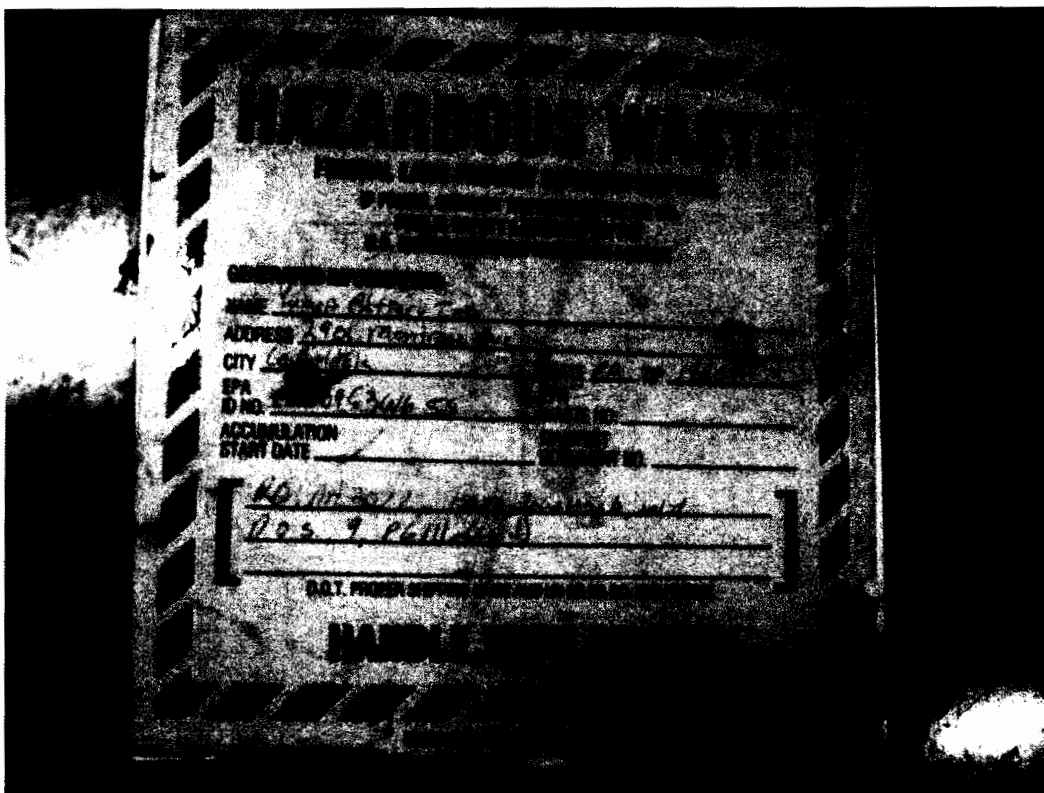


Photo 41: Close-up of label on Photo 39 hopper -- no date



Photo 42: Four 55gal drums found in Plate Parting area

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Photo 43: View inside leftmost drum from Photo 42



Photo 44: View inside rightmost drum from Photo 42

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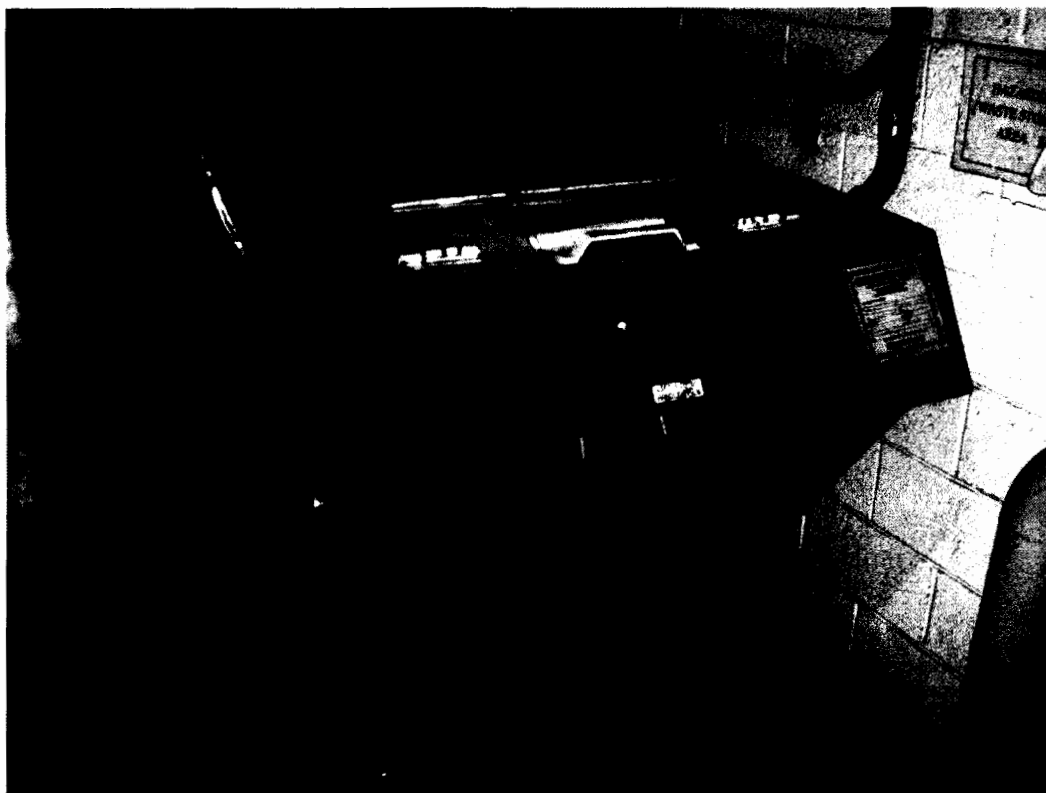


Photo 45: HW hopper in Assembly area

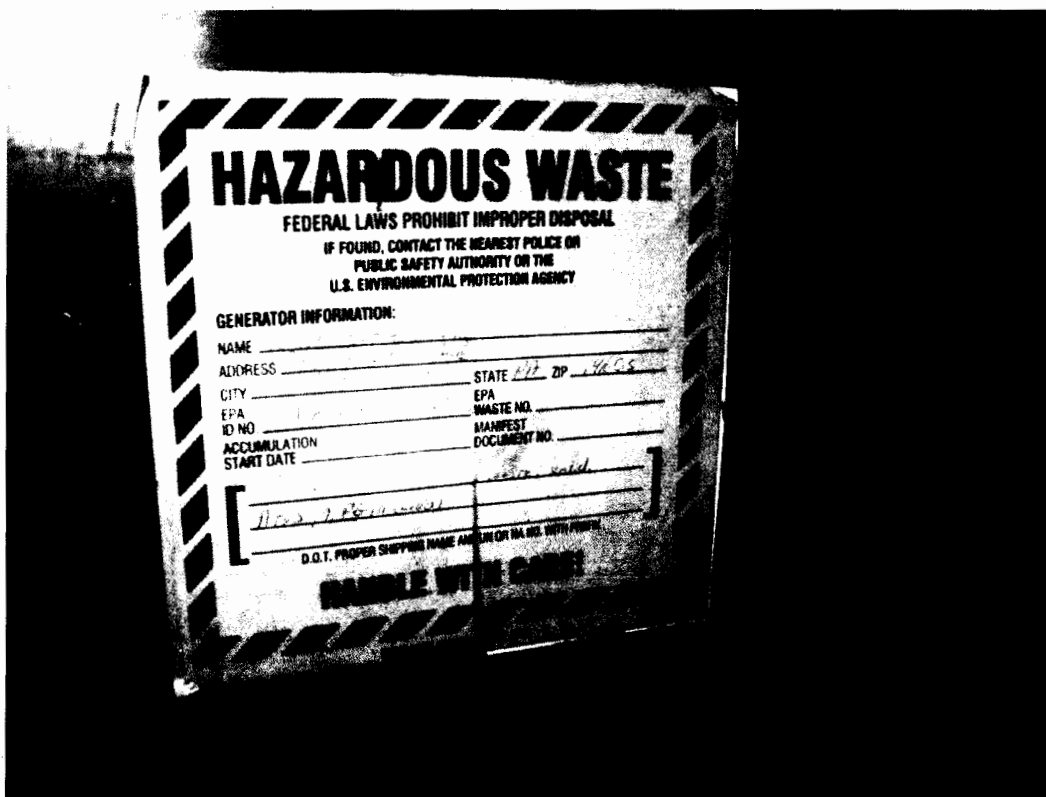


Photo 46: Close-up of label from Photo 45 hopper -- no date

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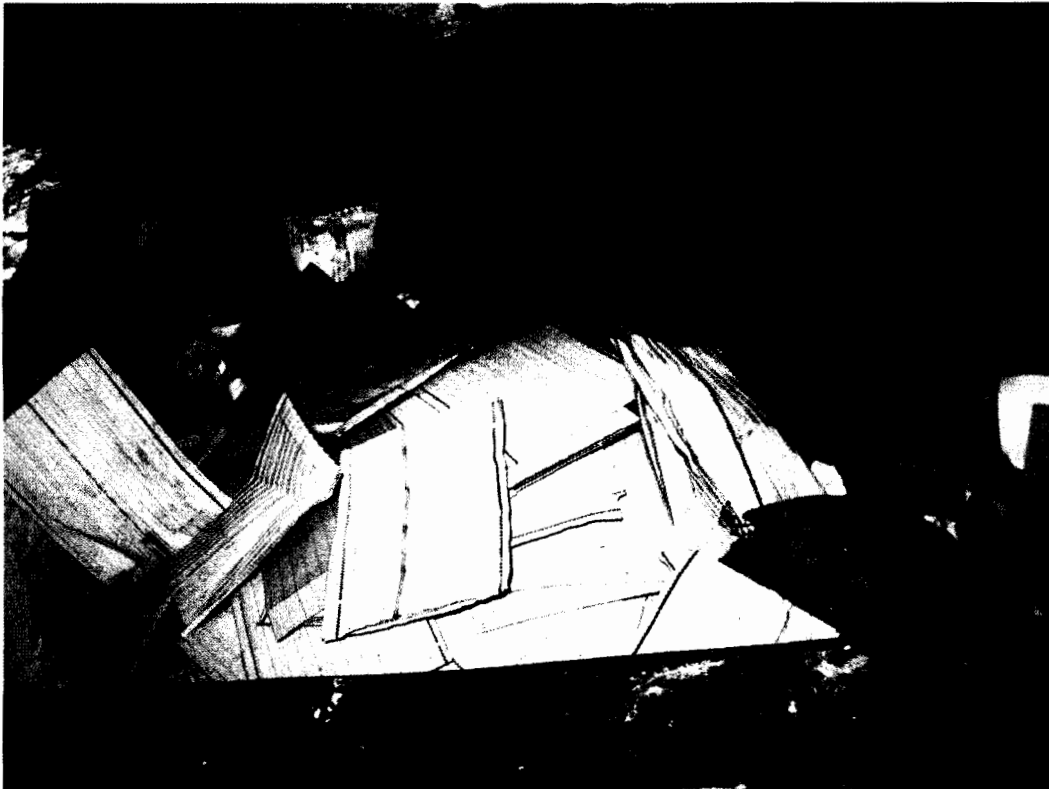


Photo 47: View inside Photo 45 hopper



Photo 48: Two containers in QC Lab

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Yuasa Battery, Inc. PAD095361655
Inspection Date 9/15/09

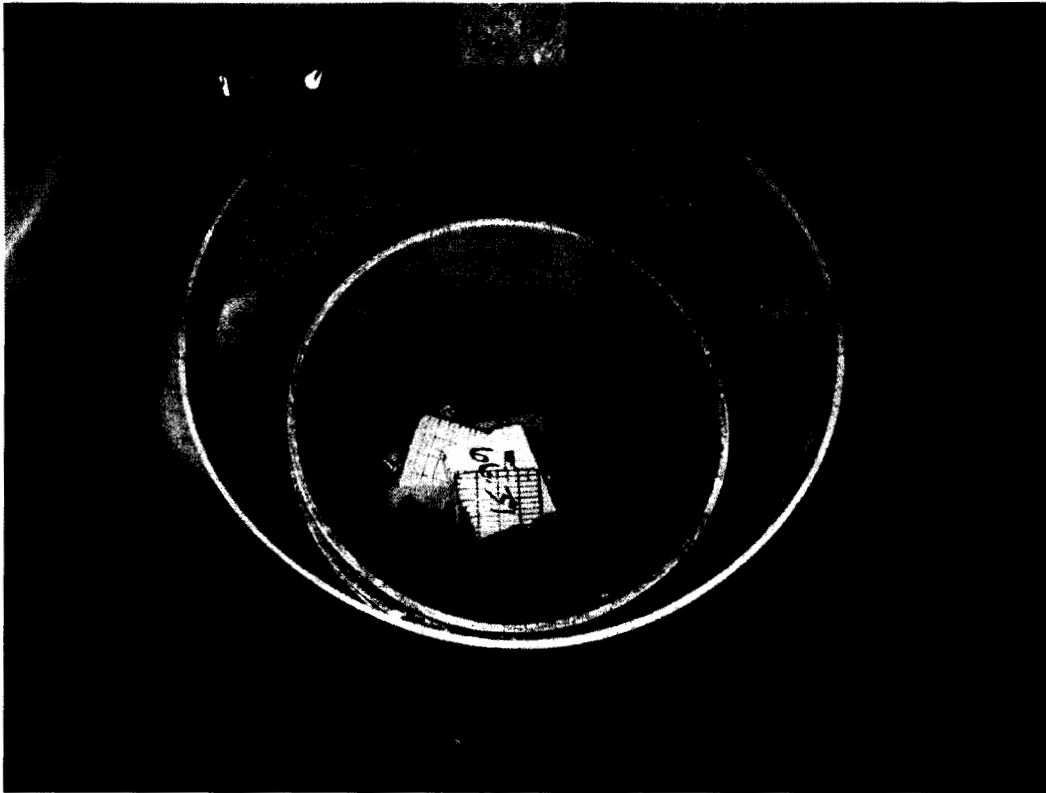


Photo 49: Contents of unlabeled container on right from Photo 48

Photographic Log
Yuasa Battery, Inc. PAD095361655
Inspection Date 9/22/09



Photo 50: Can puncturer and storage drum in Grid Storage/HW Room



Photo 51: Close-up of can puncturing drum

Photographic Log
Yuasa Battery, Inc. PAD095361655
Inspection Date 9/22/09



Photo 52: View inside can storage drum from Photo 50



Photo 53: Open HW roll-off container in storage area

Photographic Log
Yuasa Battery, Inc. PAD095361655
Inspection Date 9/22/09

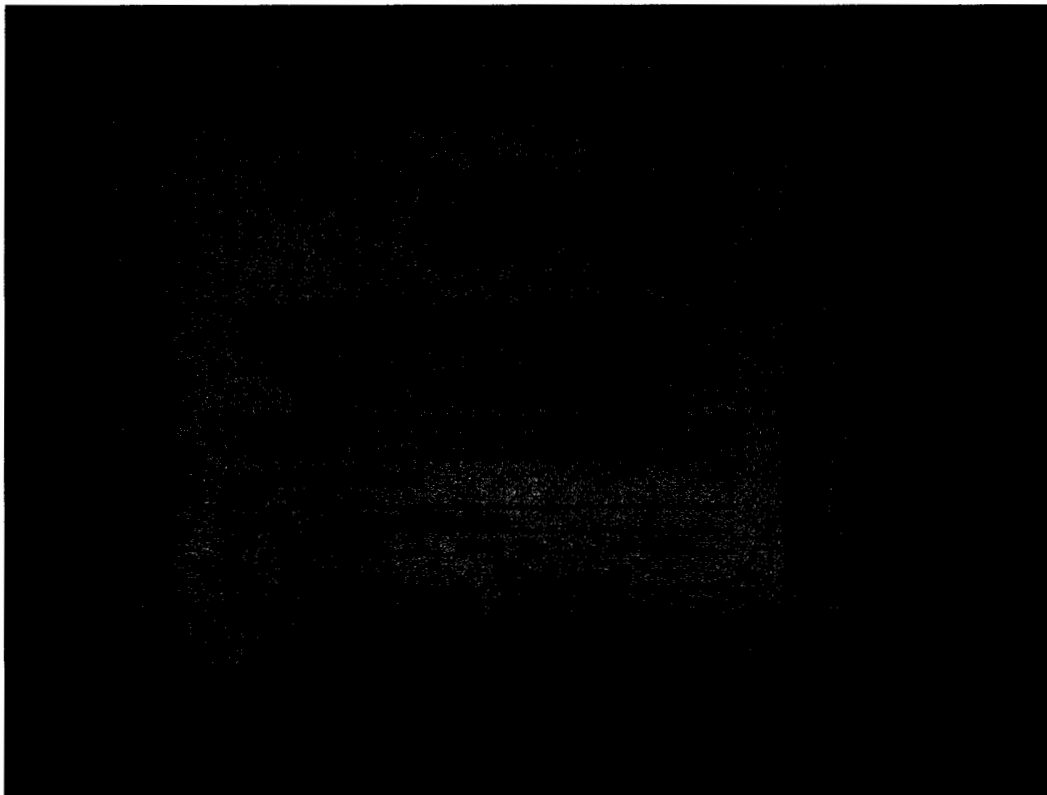


Photo 54: Label on Photo 53 roll-off container (also labeled as "Residual Waste")

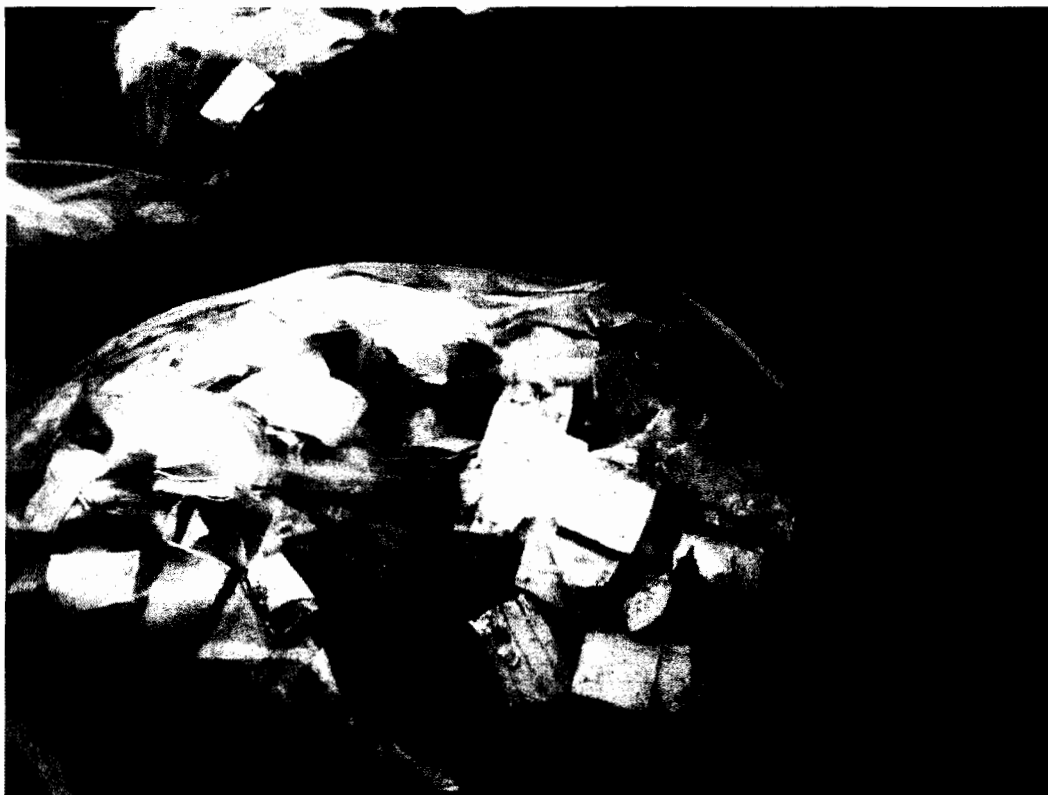


Photo 55: View into roll-off container from above -- individual bags appeared closed but unlabeled

Photographic Log
Yuasa Battery, Inc. PAD095361655
Inspection Date 9/22/09



Photo 56: Additional view into roll-off from above



Photo 57: Additional view of roll-off contents

Attachment #2

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number	2. Response Phone	4. Manifest Tracking Number			
				006070089 JJK			
5. Generator's Name and Mailing Address		Generator's Site Address (if different than mailing address)					
Generator's Phone:		U.S. EPA ID Number					
6. Transporter 1 Company Name		U.S. EPA ID Number					
7. Transporter 2 Company Name		U.S. EPA ID Number					
8. Designated Facility Name and Site Address		U.S. EPA ID Number					
Facility's Phone:							
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
1.	AC Waste Flammable Solids Organic	1	YX 1	1800			
2.							
3.							
4.							
14. Special Handling Instructions and Additional Information							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generators/Offor's Printed/Typed Name		Signature		Month	Day	Year	
Kobla S. Dauh				09	16	09	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name		Signature		Month	Day	Year	
WAYNE C MOHR				09	16	09	
Transporter 2 Printed/Typed Name		Signature		Month	Day	Year	
18. Discrepancy							
18a. Discrepancy Indication Space <input checked="" type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number:							
18b. Alternate Facility (or Generator)		U.S. EPA ID Number					
Facility's Phone:							
18c. Signature of Alternate Facility (or Generator)				Month	Day	Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1.	2.	3.	4.				
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name		Signature		Month	Day	Year	

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number	Emergency Response Phone	4. Manifest Tracking Number		
				006070088 JJK		
5. Generator's Name and Mailing Address		Generator's Site Address (if different than mailing address)				
Generator's Phone:						
6. Transporter 1 Company Name		U.S. EPA ID Number				
7. Transporter 2 Company Name		U.S. EPA ID Number				
8. Designated Facility Name and Site Address		U.S. EPA ID Number				
Facility's Phone:						
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
		No.	Type			
	1. RC Waste Flammable Liquid (Acetone) (Hazard Class 2.1) (Packing Group II) (UN 1029) (4-1)	1	DRUM	4.55		1000
	2. RC Hazardous Waste (Acetone) (Hazard Class 2.1) (Packing Group II) (UN 1029) (4-1)	1	DRUM	4.55		1000
	3.					
	4.					
14. Special Handling Instructions and Additional Information						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Officer's Printed/Typed Name		Signature		Month	Day	Year
				11	11	11
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:						
17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name		Signature		Month	Day	Year
				11	11	11
Transporter 2 Printed/Typed Name		Signature		Month	Day	Year
18. Discrepancy						
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
Manifest Reference Number:						
18b. Alternate Facility (or Generator) U.S. EPA ID Number						
Facility's Phone:						
18c. Signature of Alternate Facility (or Generator) Month Day Year						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1.		2.		3.		4.
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
Printed/Typed Name		Signature		Month	Day	Year

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number FAD05361855		3. Emergency Response Phone 800-851-7154		4. Manifest Tracking Number 006070092 JJK	
		5. Generator's Name and Mailing Address USA Battery Inc. 2801 Montrose Avenue Reading PA 19602 Generator's Phone: 610-924-5781		Generator's Site Address (if different than mailing address)			
6. Transporter 1 Company Name Env Transportation, Inc.		U.S. EPA ID Number FAC068721020					
7. Transporter 2 Company Name		U.S. EPA ID Number					
8. Designated Facility Name and Site Address Max Environmental Technologies Inc. 233 Max Lane Vinton PA 15596 Facility's Phone: 724-722-3500		U.S. EPA ID Number FAC004830140					
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
	1. RC Hazardous Waste, Solid, HCL (Lead), G. HAZWTF PG III	1	GM	30		EXEM	
	2.						
	3.						
	4.						
14. Special Handling Instructions and Additional Information at Filter Press Sludge and Debris ERG 171 GHS No. 552 Env to Env Environmental							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offeror's Printed/Typed Name				Signature		Month Day Year 10/9	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name SCAH Zichuan				Signature		Month Day Year 10/16/09	
Transporter 2 Printed/Typed Name				Signature		Month Day Year	
18. Discrepancy							
18a. Discrepancy Indication Space <input checked="" type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number:							
18b. Alternate Facility (or Generator)						U.S. EPA ID Number	
Facility's Phone:							
18c. Signature of Alternate Facility (or Generator)						Month Day Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1.		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name				Signature		Month Day Year	

Attachment #3

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number PAD095361655	2. Page 1 of 1	3. Emergency Response Phone 800-851-7156	4. Manifest Tracking Number 002054654 JJK	
5. Generator's Name and Mailing Address Pulse Battery, Inc. 2901 Montrose Avenue Reading, PA 19605 610-929-5781		Generator's Site Address (if different than mailing address)				
Generator's Phone:						
6. Transporter 1 Company Name Elk Transportation, Inc.		U.S. EPA ID Number PAD987271020				
7. Transporter 2 Company Name		U.S. EPA ID Number				
8. Designated Facility Name Michigan Disposal Waste Treatment 49350 N. I-94 Service Drive Belleville, MI 48111 800-582-5489		U.S. EPA ID Number MID000724831				
Facility's Phone:						
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ, Hazardous Waste, Solid, n.o.s. (Lead), 9, NA3077, PG III	XX26	CF	6698	P	D008
X	2. RQ, Hazardous Waste, Solid, n.o.s. (Lead), 9, NA3077, PG III	XX20	DM	7148	P	D008
	3.					
	4.					
14. Special Handling Instructions and Additional Information a) ERG# 171 Approval No. H061013MDI (Skid Wood) b) ERG# 171 Approval No. I061105MDI (DTC Filter Press Sludge) Bill to: Elk Environmental YU0328A7 / 060804LT						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Offor's Printed/Typed Name Emily S. Oswald		Signature Emily S Oswald		Month Day Year 14 5 07		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Transporter signature (for exports only): Date leaving U.S.:						
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Brian Ravenzahn Signature [Signature] Month Day Year 10 05 07 Transporter 2 Printed/Typed Name Signature Month Day Year						
18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number:						
18b. Alternate Facility (or Generator) U.S. EPA ID Number Facility's Phone:						
18c. Signature of Alternate Facility (or Generator) Month Day Year						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. 2. 3. 4.						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name Signature Month Day Year						

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number	2. Page 1 of	3. Emergency	4. Manifest Tracking Number			
					002054896 JJK			
5. Generator's Name and Mailing Address		Generator's Site Address (if different than mailing address)						
Generator's Phone:								
6. Transporter 1 Company Name		U.S. EPA ID Number						
7. Transporter 2 Company Name		U.S. EPA ID Number						
8. Designated Facility Name and Site Address		U.S. EPA ID Number						
Facility's Phone:								
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
	1.		xx15		7,328			
	2.		xx24		6,229			
	3.							
	4.							
14. Special Handling Instructions and Additional Information								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Officer's Printed/Typed Name		Signature		Month		Day	Year	
K. S. D. D. D.		K. S. D. D. D.		11		22	07	
TRANSPORTER INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit:					
	Transporter signature (for exports only):		Date leaving U.S.:					
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials							
	Transporter 1 Printed/Typed Name		Signature		Month		Day	Year
DESIGNATED FACILITY	Transporter 2 Printed/Typed Name		Signature		Month		Day	Year
	18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection		Manifest Reference Number:						
18b. Alternate Facility (or Generator)		U.S. EPA ID Number						
Facility's Phone:								
18c. Signature of Alternate Facility (or Generator)		Month Day Year						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1.		2.		3.		4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a								
Printed/Typed Name		Signature		Month		Day	Year	

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number 002054897 JJK		
5. Generator's Name and Mailing Address		Generator's Site Address (if different than mailing address)					
Generator's Phone:							
6. Transporter 1 Company Name		U.S. EPA ID Number					
7. Transporter 2 Company Name		U.S. EPA ID Number					
8. Designated Facility Name and Site Address		U.S. EPA ID Number					
Facility's Phone:							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1.		XX 2		1666		
	2.						
	3.						
	4.						
14. Special Handling Instructions and Additional Information							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offor's Printed/Typed Name		Signature			Month	Day	Year
Robin S. Daub		[Signature]			05	22	07
INTL	16. International Shipments		<input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit:		
	Transporter signature (for exports only):				Date leaving U.S.:		
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials						
	Transporter 1 Printed/Typed Name	Signature		Month	Day	Year	
[Signature]		[Signature]		05	22	07	
Transporter 2 Printed/Typed Name		Signature		Month	Day	Year	
DESIGNATED FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	Manifest Reference Number:						
	18b. Alternate Facility (or Generator) U.S. EPA ID Number						
	Facility's Phone:						
18c. Signature of Alternate Facility (or Generator)					Month	Day	Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1.		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name		Signature			Month	Day	Year

Attachment #4

Yuasa Battery, Inc
Hazardous Waste Storage Area
Inspection Log

Date: 1-07-05

Record of Observations

Storage Area	1. Container placement and Aisle Spacing	2. Sealing of Containers. Indicate: (1) satisfactory (2) unsatisfactory	3. Labeling of Containers (Date) Indicate: (1) satisfactory (2) unsatisfactory	4. Container Condition: (a) corrosion or structural defects detected - yes/no (b) Leaks or spills detected - yes/no	5. Approximate waste inventory (quantity & unit or measure)	6. Containment Area: (a) corrosion or structural defects detected - yes/no (b) Leaks or spills detected - yes/no	7. Warning Signs (missing or damaged). Indicate (1) satisfactory (2) unsatisfactory	8. Comments	9. Description of remedial action taken If any (if not applicable, indicate N/A)	10. Date remedial action started	11. Date remedial action started
A - Pasting	OK	1	1	no/no	1 cys	no/no	1	none			
A1 - Pasting Bolts	OK	1	1	no/no	1 cys	no/no	1	none			
B - Grid Casting	OK	1	1	no/no	1 cys	no/no	1	none			
C - Assembly Line 1 & 2	OK	1	1	no/no	1 cys	no/no	1	none			
D - Assembly Saw	OK	1	1	no/no	1 cys	no/no	1	none			
E - Assembly Exit	OK	1	1	no/no	1 cys	no/no	1	none			
F - Formation	OK	1	1	no/no	1 cys	no/no	1	none			
G - New Gridcasting	OK	1	1	no/no	1 cys	no/no	1	none			
H - Hazardous Waste Room	OK	1	1	no/no	3 bags for down	no/no	1	none			
H1 - Scrap wood	OK	1	1	no/no	1 cys	no/no	1	none			

Attachment #5

Certificate

This is to certify that

Robin S. Daub
Tyler Pipe (PENN)

has successfully completed

Advanced RCRA

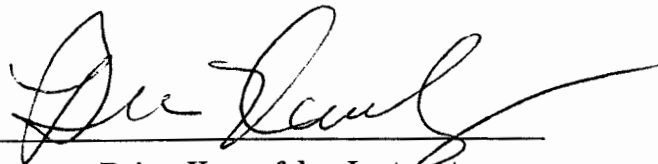
in accordance with 40 CFR 265.16

presented by

ENVIRONMENTAL RESOURCE CENTER

101 Center Pointe Drive, Cary, NC 27513 919-469-1585

www.ercweb.com



Brian Karnofsky, Instructor

April 22, 2005

Date

Certificate Number: 95267

Certificate of Achievement

HWMC

This certificate has been awarded to:

Robin S. Daub

at

Plymouth Meeting, Pennsylvania

Session#: 13237

*For successfully completing the Lion Technology Inc.
Hazardous/Toxic Waste Management Workshop on the applicable regulations
of the United States Environmental Protection Agency and guidelines, standards
and procedures for safe and legal management of waste designated as hazardous.*

This workshop is designed to satisfy the annual training mandate for typical managers and supervisors of
hazardous waste compliance activities. Training was conducted by*

Lion Technology Inc., 21 Sunset Inn Road, Lafayette, NJ 07848 (973-383-0800).

**[Ref. 40 CFR 262.34(a)(4) and 265.16 or 40 CFR 262.34(d)(5)(iii)]*

This training completed on: 19 December 2008

National Registry of Professionals - Member PIN: 001-8573

1.4 CEUs, 1.0 CHMM CM Points, 2.0 ABIH CM Points, 14 NEHA CE Contact Hours Awarded

Robert B. Hone

INSTRUCTOR



LION
TECHNOLOGY INC.

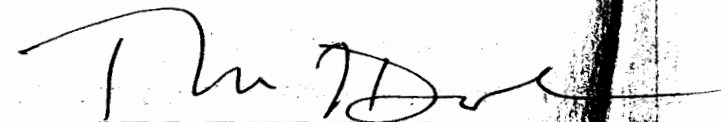
Hazardous Waste Certificate of Training

This is to certify that

Robin S. Daub

Successfully completed **Hazardous Waste Generator Training** required by the Pennsylvania Department of Environmental Protection Regulations (25 Pa. Code, Chapter 262a. entitled Standards Applicable to Generators of Hazardous Waste) and the United States Environmental Protection Agency Regulations (40 CFR 265.16). The training also included instruction on the use of the United States Department of Transportation Hazardous Materials Shipping Regulations (49 CFR). The training consisted of lectures, workshops and detailed instruction on the use of the regulations and applicable regulatory requirements. The training was conducted on November 13th & 14th, 2006 by qualified instructors from **TOM DOLCE Training Associates**.

TOM DOLCE *Training Associates*



Thomas J. Dolce, P.E., CET
Course Instructor

Attachment #6

**M. J. Reider Associates, Inc.**107 Angelica Street
Reading, PA 19611

Phone: 610-374-5129 FAX: 610-374-7234

CHAIN OF CUSTODY RECORD

Please Print Legibly

(INSTRUCTIONS ON BACK OF THIS FORM)

DISTRIBUTION: White: Report, Yellow: Lab; Pink: Submitter

R 02511

Page ____ of ____

6. Report Type:

Routine

Standard QC

Data Package

7. Turnaround Time

Standard

RUSH: ____/____/____

1. Client (Company or Individual):

794 MUASA Battery

Address:

2901 Montrose Ave

City:

Laureldale

State:

PA

ZIP: 19608

Phone:

FAX:

2. Invoice To: (If different from above)

Address:

City:

State:

ZIP:

Phone:

FAX:

3. Client Project Name / #

794

4. P.O. No.:

5. Sampled By:

CST

Matrix Code (for item 12)

Container Codes (for item 13)

SIZE

TYPE

Preservative Code (for item 14)

A = Ascorbic Acid

T = Na2S2O3

C = HCl

E = EDTA

N = HNO3

L = NH4Cl

S = H2SO4

Z = Zinc Acetate

P = H3PO4

V = Ascorbic/HCl

H = NaOH

O = Other

M = Monochloroacetic Acid

Sample Receipt Information

Temperature @ 4C?

X

N

Samples received on ice?

X

N

Sample Containers Intact?

Y

N

VOC's Free of Headspace?

Y

N

COC Seal Intact or attached?

Y

N

Samples Shipped or Hand Delivered

Method of Shipment:

Tracking #:

Cooler Return Fee:

ICE CHEST NUMBER:

Checked by:

DSM

17. SPECIAL INSTRUCTIONS/COMMENTS:

8. COMPLIANCE PURPOSE:

☐ Public Drinking Water: PA SDWA Forms Required☐ FHA/Realty

PWSID #

☐ NPDES

MJRA

9. Sample

ID #

Description

10.

11.

12.

Date

Time

Composite

Grab

Matrix

16.

Total # of Containers

13. Container: Size / Type

14. Preservative

15. Analyses Requested

Total Lead

Total Lead

18. RELINQUISHED BY

Daniel A. Miller

19. RECEIVED BY

[Signature]

DATE

TIME

5-30-08

1430

5-30-08

1500

Entered by:

Approved by:

TST

Comments:

The Client, by signing, or having client's agent sign, this Chain of Custody Form, agrees to pay for the above requested services per the MJRA Price List or Quotation provided including any and all attorney fees if collection becomes necessary.



CERTIFICATE OF ANALYSIS

M.J. Reider Associates, Inc.



Attention: Robin Daub
Reported to: Yuasa Battery, Inc.
2901 Montrose Ave.
Laureldale PA 19605

Date of Report: 06/16/08
Project Number: 0911711
Lab ID: 0794-08-0018274
Account Rep: Richard Wolfe
Date Received: 05/30/08
Date Collected: 05/30/08
Time Collected: 11:30
Collected By: Client

Sample Description: DTC Filter Press

* Results expressed as Dry Weight

	Results	Unit	Date	Procedure	Detection
					Limit
CHEMISTRY					
RESIDUES					
Total Solids	20.2	%	06/05	SM 2540G	1
INORGANIC					
TOTAL					
Lead, Total	27	* %	06/11	SW846 6010	0.50

Distribution of Report:
Robin Daub - Yuasa Battery, Inc.

M. J. Reider Associates, Inc.
Reviewed and Approved By:


Richard Wolfe
Technical Director

Page 1 of 1

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CERTIFICATE OF ANALYSIS
M.J. Reider Associates, Inc.



Attention: Robin Daub
Reported to: Yuasa Battery, Inc.
2901 Montrose Ave.
Laureldale PA 19605

Date of Report: 06/16/08
Project Number: 0911711
Lab ID: 0794-08-0018275
Account Rep: Richard Wolfe
Date Received: 05/30/08
Date Collected: 05/30/08
Time Collected: 11:30
Collected By: Client

Sample Description: Lead Mud Filter Press

* Results expressed as Dry Weight

	Results	Unit	Date	Procedure	Detection
					Limit
CHEMISTRY					
RESIDUES					
Total Solids	86.9	%	06/05	SM 2540G	1
INORGANIC					
TOTAL					
Lead, Total	59.4	* %	06/11	SW846 6010	0.115

Distribution of Report:
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Attachment #7

Lead Calculations

Total lead in scrap to smelter (RSR)	1,832,252 lb.
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Plant Trash sent to Conestoga Landfill		(ppm)	
	weight	lead conc.	Total lead
Plant Trash	83740	116.00	9.71 lb.
Lead sent off site to Conestoga Lanc			10 lb



Straight Bill of Lading

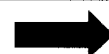
DATE: 9/17/2009Page 1 of 1

SHIPPED FROM	SHIP TO
YUASA BATTERY, INC.	REVERE SMELTING & REFINING CORPORATION
2901 MONTROSE AVENUE	65 BALLARD ROAD
LAURELDALE, PA 19605	MIDDLETOWN, NY 10941

FOR 24 HOUR EMERGENCY ASSISTANCE CALL CHEMTREC 1-800-424-9300
FOR ADDITIONAL EMERGENCY RESPONSE INFORMATION REFER TO ERG 154, 157 and 171

NO. PKG.	CONTAINER TYPE	HM	BASIC SHIPPING DESCRIPTION	WEIGHT (LBS)
			RQ, UN3077, Environmentally hazardous substances, solid, n.o.s., 9, III (Lead) (Paste sludge/mud)	5,013
			RQ, UN3077, Environmentally hazardous substances, solid, n.o.s., 9, III (Lead) (Baghouse dust)	2,476
			RQ, UN3077, Environmentally hazardous substances, solid, n.o.s., 9, III (Lead) (Pasted plates)	818
			RQ, UN3077, Environmentally hazardous substances, solid, n.o.s., 9, III (Lead) (Dross)	5,949
			RQ, UN3077, Environmentally hazardous substances, solid, n.o.s., 9, III (Lead) (Oxide)	4,837
			RQ, UN3077, Environmentally hazardous substances, solid, n.o.s., 9, III (Lead) (Battery plates)	10,697
			RQ, UN3077, Environmentally hazardous substances, solid, n.o.s., 9, III (Lead)	
			UN2794, Batteries, wet, filled with acid, 8, III	
			Batteries, dry, non-regulated	6,672
			Battery cases, plastic, non-regulated	
			Lead scrap, non-regulated (Parts metal)	
			Lead scrap, non-regulated (Grid metal, sawings)	4,805
			Lead scrap, miscellaneous	
			Battery parts, lead, non-regulated	

NET WEIGHT



41,267

GROSS WEIGHT



43,875

22

TOTAL NO. PKGS.

SHIPPER'S CHECKLIST

DOT LABELS APPLIED AND SECURE	
PROPER DOT NAME ON ALL PACKAGES	
DOT AUTHORIZED CONTAINERS	
CHECKED FOR PROPER SEALING	
PLACARDS OFFERED	YES ___ NO ___
PLACARDS SUPPLIED BY CARRIER	YES ___ NO ___
DRIVER'S SIGNATURE	X

Shipper's weight, per BW (Initial)

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

YUASA BATTERY, INC.

Shipper's Signature: Brian J. WorleyDriver's Signature: [Signature]Dated: 9/17/09Dated: 9-17-09



Straight Bill of Lading

DATE: _____

Page ____ of ____

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			RQ, UN3077, Environmentally hazardous substances, solid, n.o.s., 9, III (Lead) (Baghouse dust)	
			RQ, UN3077, Environmentally hazardous substances, solid, n.o.s., 9, III (Lead) (Pasted plates)	
			RQ, UN3077, Environmentally hazardous substances, solid, n.o.s., 9, III (Lead) (Dross)	
			RQ, UN3077, Environmentally hazardous substances, solid, n.o.s., 9, III (Lead) (Oxide)	
			RQ, UN3077, Environmentally hazardous substances, solid, n.o.s., 9, III (Lead) (Battery plates)	
			RQ, UN3077, Environmentally hazardous substances, solid, n.o.s., 9, III (Lead)	
			UN2794, Batteries, wet, filled with acid, 8, III	
			Batteries, dry, non-regulated	
			Battery cases, plastic, non-regulated	
			Lead scrap, non-regulated (Parts metal)	
			Lead scrap, non-regulated (Grid metal, sawings)	
			Lead scrap, miscellaneous	
			Battery parts, lead, non-regulated	

	NET WEIGHT →	
← TOTAL NO. PKGS.	GROSS WEIGHT →	

SHIPPER'S CHECKLIST	
DOT LABELS APPLIED AND SECURE	
PROPER DOT NAME ON ALL PACKAGES	
DOT AUTHORIZED CONTAINERS	
CHECKED FOR PROPER SEALING	
PLACARDS OFFERED	YES___ NO___
PLACARDS SUPPLIED BY CARRIER	YES___ NO___
DRIVER'S SIGNATURE X	

Shipper's weight, per _____ (Initial)

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

YUASA BATTERY, INC.

Shipper's Signature: _____ Driver's Signature: _____

Dated: _____

Dated: _____

Attachment #8



"Daub Robin"
<daubr@yuasainc.com>
10/07/2009 04:53 PM

To: Martin Matlin/R3/USEPA/US@EPA
cc
bcc
Subject: RE: Yuasa Inspection

History: This message has been replied to.

Hi Martin,

I apologize for the confusion last week, Mark tried his best with me out the whole week on bereavement leave.

I am attaching the corrected drawing for haz waste locations (the one he sent you last week had errors on it); which is now in the updated Spill/Contingency Plan in Appendix F, and includes locations of spill cleanup equipment. I also attached the updated plan which has not been scanned yet with signatures and drawings. But, you will notice in Appendix F that I also added a section for Haz Waste Handlers.

Copies of (Fire Chief) Dan Miller's annual training is also included.

Dan and I discussed the missing inspection reports and we both came to the same conclusion. All the reports were pulled out of the files for the DEP HW inspection in August of 2008. Somehow they had to be misplaced at that time when we were copying records, or they were accidentally taken by the inspector with the copies. It is the only thing that makes sense because all the inspections for 2008 after August are here.

I can try to contact the DEP inspector, Steven Unger, to see if he has any knowledge of the files from last year. Please contact me with any further questions.

Sorry for the inconvenience,

Robin S. Daub
EHS Manager
Yuasa Battery, Inc.
2901 Montrose Avenue
Reading, PA 19605
Phone (610)921-5228
Fax (610)929-8653
daubr@yuasainc.com

-----Original Message-----

From: Matlin.Martin@epamail.epa.gov [mailto:Matlin.Martin@epamail.epa.gov]
Sent: Monday, September 28, 2009 8:53 AM
To: Daub Robin
Subject: Re: Yuasa Inspection

Thanks very much Robin!

Martin

Martin Matlin (3LC70)

Office of Land Enforcement
U.S. EPA Region III
1650 Arch St., Philadelphia, PA 19103-2029
(215) 814-5789
(215) 814-3163 (fax)

"Daub Robin"
<daubr@yuasainc.
com>

09/25/2009 03:27
PM

Martin Matlin/R3/USEPA/US@EPA

To

cc

Subject

Yuasa Inspection

Martin,

Attached is the copy of the Yuasa Spill Prevention/Control Plan updated January 2009. I will forward the updated Appendix F to you on Monday. Our engineer is changing the drawing of hazardous waste storage areas to include the spill equipment locations, which are currently found on page 17 of the plan. I am adding the hazardous waste operators with job descriptions to this appendix as well.

At this time, we have not located the balance of the inspection logs for 2007. I know that we had the complete file for our HW inspection in 2008? I have also left a message with Emily, who resigned on August 28, if she has any information on the missing file.

It was nice 'meeting' you again and very unusual that you inspected my location at my previous position at Tyler Pipe. I miss that place!

Have a nice weekend,

Robin

<<SPCC rev.2_012507 JANUARY 2009.doc>>

Robin S. Daub
EHS Manager
Yuasa Battery, Inc.
2901 Montrose Avenue

Reading, PA 19605
Phone (610) 921-5228
Fax (610) 929-8653
daubr@yuasainc.com

[attachment "SPCC rev.2_012507 JANUARY 2009.doc" deleted by Martin
Matlin/R3/USEPA/US]



SPCC rev.9_September 2009.doc Hazardous Waste Locations Dwg_100609.pdf Dan Miller's Training_09.pdf